

Disability Inclusion Guide for Financial Services Providers (FSPs)



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- Association of Microfinance Institutions of Uganda (AMFIU)
- BRAC Myanmar
- CBM
- Ektha
- Global Disability Inclusion Hub
- Good Return
- Humanity & Inclusion (HI)
- International Disability Alliance (IDA)
- Opportunity Bank of Uganda Ltd.
- Opportunity International

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INTRODUCTION TO THIS GUIDE

Purpose and target audience

This guide is intended to support **financial services providers (FSPs)** to advance the equitable inclusion of persons with disabilities as clients, employees and stakeholders, as an integral part of their responsible finance and social performance strategies.

The primary target audience for the guide is **formal FSPs**, including banks, microfinance institutions (MFIs), fintechs, cooperatives, insurers, credit unions, and other regulated financial institutions.

While the guide is designed primarily for FSPs, it is also intended to be a practical resource for other stakeholders working to promote financial and economic inclusion of persons with disabilities, including:

- **Disability inclusion actors** such as organizations of persons with disabilities (OPDs), non-governmental organizations (NGOs) and disability support organizations, seeking to engage with financial institutions or advocate for more inclusive practices;
- **Public sector institutions**, including government bodies, central banks, and regulators, that set policy and regulatory frameworks, incentives, or supervisory mechanisms related to financial inclusion and consumer protection; and
- **Other inclusive finance actors** such as industry associations, networks, bilateral and multilateral organizations, development agencies, impact investors, and technical assistance providers.

Using the guide

The guide is designed to be **flexible and modular**, providing practical guidance for FSPs at different stages of their disability inclusion journey.

It does not prescribe a single model for disability inclusion, but offers principles, options and examples that can be adapted to specific institutional and regulatory contexts.

Recognizing the diversity of persons with disabilities, including differences in type of impairments, gender, age, income level, and geographic location, it emphasizes the need for context-specific solutions and alternatives, developed and implemented in collaboration with persons with disabilities.

The guide can be used in the following ways:

- as a **stand-alone guide and reference manual** to support the design, implementation and monitoring of disability inclusion strategies, policies and practices across FSP operations, and / or
- **as a complementary resource** to support the integration of disability inclusion strategies within the FSP's existing **social performance management systems**, aligned to **Cerise+SPTF's Universal Standards for Social and Environmental Performance Management (USSEPM)**.

It is structured in four main chapters as shown in the table below. It is recommended to **start by reading Chapter 1**, which provides an overview of disability inclusion for FSPs and introduces the key topics and frameworks that are explored in other sections of the guide.

Chapters	Content	How to use
1. Overview of disability inclusion for FSPs	<ul style="list-style-type: none"> Provides a high-level summary of the case for disability inclusion in financial services and the key issues to be addressed.. Introduces the framework of seven key building blocks of disability inclusion used in this guide. Illustrates progressive levels of disability inclusion, and first steps to get started. 	<ul style="list-style-type: none"> As an stand-alone orientation for FSP leaders and managers to the topic of disability inclusion and how it applies to FSPs. For all users, as an introduction to the concepts and frameworks presented in this guide.
2. Introduction to disability inclusion	<ul style="list-style-type: none"> Introduces core concepts of disability and inclusion. Outlines the social and rights- based models and principles of disability inclusion which underpin this guide. Defines key enablers of disability inclusion such as accessibility and reasonable accommodation. 	<ul style="list-style-type: none"> To build an understanding of the rights and perspectives of persons with disabilities, as a foundation for inclusion. As reference material for designing sensitization and awareness-raising training.
3. Financial services context	<ul style="list-style-type: none"> Explores the business case for disability-inclusive financial services Outlines key barriers to accessing financial services for persons with disabilities Provides an overview of the legal and policy context. 	<ul style="list-style-type: none"> To understand the benefits of disability inclusion for FSPs. As reference material to inform the development of organizational disability inclusion strategies.
4. Disability Inclusion practices for FSPs	<ul style="list-style-type: none"> Provides a series of toolkits for each of the building blocks for disability inclusion. Outlines key practices in each area, with technical guidance, examples, case-studies, and links to resources for implementation. 	<ul style="list-style-type: none"> To support managers, functional teams and project leads in developing and implementing action plans to advance disability inclusion.
Annex 1:	<ul style="list-style-type: none"> Provides a framework of disability inclusion indicators mapped to the Universal Standards for Social and Environmental Performance Management (USSEPM) dimensions, standards, and essential practices 	<ul style="list-style-type: none"> To support FSPs who use the USSEPM framework to integrate disability inclusion within their social performance management systems.

Acronyms and abbreviations

Acronym	Meaning
ADHD	Attention-deficit/hyperactivity disorder
AI	Artificial intelligence
ATM	Automated teller machine
CEO	Chief Executive Officer
CFI	Center for Financial Inclusion at Accion
DEI	Diversity, equity, and inclusion
EAA	European Accessibility Act (2019)
EU	European Union
FSP	Financial services provider
GBV	Gender-based violence
GEDSI	Gender equality, disability, and social inclusion
HIV/AIDS	Human immunodeficiency virus / Acquired immunodeficiency syndrome
HR	Human resources
ICT	Information and communications technology
ILO	International Labour Organization
ISO	International Standards Organization
IT	Information technology
IVR	Interactive voice response
MFI	Microfinance institution
MIS	Management information system
NGO	Non-governmental organization
OPD	Organization of persons with disabilities
PEEP	Personal emergency evacuation plan
PIN	Personal identification number
SDGs	Sustainable Development Goals
SMART	Specific, measurable, attainable, relevant, and time-bound
SMS	Short message service
ToT	Training of trainers
TRS	Text-based relay services
UK	United Kingdom of Great Britain and Northern Ireland

Acronym	Meaning
UN	United Nations
UNCRPD	UN Convention on the Rights of Persons with Disabilities
UNDP	United Nations Development Programme
UNFPA	United Nations Population Fund
UNICEF	United Nations Children's Fund
USA	United States of America
USSEPM	Universal Standards for Social and Environmental Performance Management
VRS	Video relay services
W3C	World Wide Web Consortium
WCAG	Web Content Accessibility Guidelines
WGSS	Washington Group Short Set on Functioning
WHS	Workplace health and safety

CHAPTER 1: OVERVIEW OF DISABILITY INCLUSION FOR FSPs

1.1 Context

An estimated **1.3 billion people - around 16% of the global population - live with a disability**, yet they remain disproportionately excluded from economic opportunities and financial systems. Globally, persons with disabilities are more likely to experience poverty as a result of **systemic exclusion** from access to education, employment, healthcare, and essential services. **Women with disabilities** experience particular marginalization, arising from both their gender and their disability.

These structural inequalities are not caused by a lack of inherent capability, but by **social and environmental barriers**. The UN Convention on the Rights of Persons with Disabilities (UNCRPD) recognizes that disability arises from the interaction between **physical, mental, intellectual or sensory impairments** experienced by individuals, and **barriers in society**, such as inaccessible infrastructure, communication barriers, negative attitudes and discrimination. Persons with disabilities are a diverse group; individuals with **different types of impairments** face different barriers, requiring different solutions.

Disability inclusion means **identifying and removing these barriers**, so that persons with disabilities can exercise their right to participate fully in all areas of life. This requires **active engagement** with persons with disabilities and their representative organizations of persons with disabilities (OPDs) to develop solutions that meet their needs. Further information on disability and key disability inclusion concepts is provided in [Chapter 2](#) of this guide.

1.2 Why disability inclusion matters for FSPs

Despite rapid advances in financial inclusion globally, persons with disabilities continue to face **multiple barriers to accessing and using financial services**. As a result, many persons with disabilities are forced to rely on informal financial mechanisms, or remain excluded from financial services entirely.

Persons with disabilities experience **systemic barriers to financial inclusion** linked to higher rates of informal and self-employment, lower or irregular incomes, and lower levels of financial and digital literacy. **Barriers at the FSP level** include inaccessible infrastructure in branches, ATMs and digital channels; lack of information in accessible formats; discriminatory attitudes and policies, barriers in product and service design; and lack of staff trained to serve clients with disabilities. These barriers are **reinforced at sector level** by low awareness of disability inclusion, limited enabling regulatory frameworks, and a lack of disability-related data.

For financial services providers (FSPs), addressing these barriers is both a **social responsibility and a business opportunity**. Persons with disabilities are present in **every population subgroup**- whichever client segments you serve, it is highly likely that there are persons with disabilities within these, and they are often amongst the most marginalized members. Taking action to include persons with disabilities within your activities **extends your impact** for your target segments – while failing to address barriers that prevent their participation risks reinforcing their marginalization.

Furthermore, persons with disabilities represent a **large, growing and underserved market segment**, providing a significant **economic opportunity**. Evidence shows persons with disabilities can be profitable clients and successful entrepreneurs when barriers to access are addressed.

Implementing disability inclusion brings wider business benefits by **fostering innovation** and user-centered approaches. Measures to improve accessibility also benefit other groups, such as older persons, and **enhance the user experience** for all clients, driving improved satisfaction and retention. Employing persons with disabilities gives access to an **untapped talent pool**, bringing new skills and perspectives, and enhances teamwork and staff engagement.

Many countries have legal frameworks enforcing non-discrimination and equal access for persons with disabilities. A proactive approach to disability inclusion not only **mitigates compliance risk**, but also **enhances brand reputation**, contributing to **long-term sustainability**.

These topics are explored more fully in [Chapter 3](#) of this guide.

1.3 Building blocks of disability inclusion for FSPs

Disability inclusion requires an **enterprise-wide approach**, with active involvement of operational and technical teams, and cross-functional collaboration. This guide presents a framework of **seven essential building blocks** for FSPs to integrate disability inclusion across their strategy, operations, products and services.



This table shows how these **seven building blocks** contribute to disability inclusion outcomes, **key components** within them, and the **organizational functions and teams** typically involved in delivery.

Table 1 Building blocks for disability inclusion

Building blocks	Inclusion outcomes	Components	Organizational functions
1. Strategy and Culture	An organizational commitment to disability inclusion goals, championed by top leadership and shared by manager and staff.	<ul style="list-style-type: none"> • Strategy and goals • Leadership commitment • Staff engagement, awareness and training 	Board, leadership team; DEI / GEDSI leads; strategy & planning, staff training; internal & external communications.
2. Management Frameworks	Disability inclusion strategies are operationalized through organizational planning, management and monitoring frameworks.	<ul style="list-style-type: none"> • Planning and performance management systems • Policies and procedures • Data and MIS 	Leadership team; business planning and budgeting; IT and Information systems; market research; risk and compliance.
3. Accessibility	Workplaces, service points and information can be accessed and used by persons with disabilities on an equal basis with others.	<ul style="list-style-type: none"> • Physical accessibility • Digital accessibility • Accessible information and communication formats 	Premises management, procurement, branch operations, channel managers, IT developers, marketing and communications.
4. Inclusive Products and Services	Persons with disabilities can access and use products and services appropriate to their needs to achieve beneficial outcomes.	<ul style="list-style-type: none"> • Inclusive design processes • Inclusive products • Inclusive service delivery • Inclusive outreach • Client trainings and capacity building 	Market research; product and service design; channel and product managers; client servicing; staff training; marketing and outreach.

Building blocks	Inclusion outcomes	Components	Organizational functions
5. Client Protection	Clients with disabilities do not experience adverse consequences from using the FSP’s products and services.	<ul style="list-style-type: none"> • Transparency, fair treatment and safeguarding • Loan decisioning and approval processes • Equitable access and risk mitigation • Identification, authorization and verification 	Client protection; risk & compliance; channel and product managers; client servicing; staff training.
6. Inclusive Employment	An inclusive workplace where persons with disabilities have equal opportunities to participate and thrive throughout the employment cycle.	<ul style="list-style-type: none"> • Recruitment and onboarding • HR management and development • Workplace health and safety 	Human resources management; line managers; workplace health & safety representatives; staff training.
7. Partnerships	Disability inclusion strategies are designed and implemented in collaboration with persons with disabilities and apply best practices.	<ul style="list-style-type: none"> • Partnerships with OPDs • Other partnerships and networks 	Leadership teams; marketing and outreach; partnership managers.

[Chapter 4](#) of this guide provides a toolkit for each of these building blocks and components, giving an overview of disability inclusion practices, action points, case-study examples, and links to more detailed resources for implementation.

1.4 The disability inclusion journey

Disability is not achieved through one project, or good intentions alone. Instead, it is realized **progressively over time**, through a series of **planned, intentional actions** driven by a shared organizational commitment.

The framework below illustrates **progressive levels of disability inclusion** as a journey of continuous improvement, with examples of benchmarks at each level. These are intended to be illustrative rather than prescriptive – your individual journey may be different, depending on your overall strategy and operating model, the context in which you operate, and your resources and capabilities.

- **Level 1: Foundational:** Initial accessibility measures and service adaptations in place, with pilot initiatives to serve and learn from persons with disabilities.
- **Level 2: Integrating:** Disability inclusion is integrated into systems, policies and practices, extending access to inclusive products, services and employment opportunities.
- **Level 3: Embedded:** Disability inclusion is part of the core business strategy, embedded in organizational culture, operations, products and services.

Table 2 Illustrative benchmarks for disability inclusion

Building blocks	Level 1: Foundational	Level 2: Integrating	Level 3: Embedded
1. Strategy and Culture	Leadership sensitized; organizational goal established; disability inclusion champion appointed; selected staff trained.	Targets and indicators monitored; staff induction includes awareness training; role-specific training for client-facing and HR staff.	Disability inclusion is a core part of business strategy; comprehensive staff training programs; promoting inclusion internally and externally.
2. Management Frameworks	Non-discrimination policy covers disability; initial actions assigned; disability data collected in client onboarding.	Disability inclusion reflected in operating plans; client and HR policies updated; disability-disaggregated data collected.	Disability inclusion embedded in planning, performance management, policy frameworks and MIS.
3. Accessibility	Basic accessibility improvements in selected locations and channels; accessible document protocols.	Accessibility standards applied in new premises and digital channels; key client information in accessible formats.	Majority of facilities and digital channels accessible; information available in accessible formats across all channels.
4. Inclusive Products and Services	Initial needs assessment conducted; basic product and service adaptations piloted; initial outreach through OPDs.	Inclusive research and disability-disaggregated data inform product, service and channel design; accessible servicing channels expanded; accessible client trainings.	Inclusive design processes embedded; flexible servicing options across all channels; systematic outreach and engagement; inclusive and tailored client trainings.

Building blocks	Level 1: Foundational	Level 2: Integrating	Level 3: Embedded
5. Client Protection	Staff trained to communicate client protection information accessibly; accessible complaints mechanisms available; no discriminatory eligibility criteria.	Client protection policies address risks of exploitation and discrimination; alternative authentication and supported decision-making options available.	Safeguarding framework implemented to prevent abuse or exploitation; risk mitigation within product design; inclusive loan decisioning processes.
6. Inclusive Employment	Job advertisements encourage persons with disabilities to apply; accommodations available; workplace safety assessed on a case-by-case basis.	Inclusive recruitment processes and workplace accommodation procedures implemented; disability-sensitive grievance and workplace health and safety mechanisms in place.	Proactive recruitment of persons with disabilities; inclusive career development pathways; disaggregated workforce metrics monitored to promote equity.
7. Partnerships	Initial engagement with Organizations of persons with disabilities (OPDs) to support needs assessment and outreach.	Regular collaboration with OPDs on outreach, training and program design; working with disability organizations to build capabilities.	Strategic long-term partnerships with OPDs; co-design of programs and services; sector leadership, knowledge sharing and promotion of inclusion.

1.5 Getting started

Many FSPs recognize disability inclusion as the ‘right thing to do’, but don’t know how to start with implementation, or feel it is too costly, or requires specialized expertise. However, you can start to improve accessibility and inclusion by **piloting simple solutions** that need no technical expertise and little resources, and gradually extending these over time.

It is important from the outset to gain **commitment from top leadership** and **engage with OPDs** to support **needs assessment** and **outreach**. Carry out an **internal assessment** to identify and prioritize key barriers to address. Use these insights to **design and implement pilot interventions**, and start **collecting disability data** to monitor and refine strategies.

The information box below outlines a **simple process and steps to start your disability inclusion journey** using this approach. Within this, specific actions can be adapted to your situation – for example, rather than pilots in branches, a digital financial services provider could train key staff to conduct an initial digital accessibility assessment, and pilot “quick fixes” to its apps through user-testing with OPDs. The **case studies** in **section 1.6** below provide examples of approaches taken by different FSPs to advance disability inclusion.

Info box: First steps

Step 1: Awareness and commitment

- **Hold sensitization workshops** with the Board and leadership team to build a common understanding of disability inclusion principles, and the rationale for disability inclusion.
- **Investigate applicable legal and policy frameworks** for accessibility and inclusion.
- **Agree a high-level goal** for disability inclusion, aligned to your mission and values.
- **Establish a non-discrimination policy** that prohibits discrimination on the basis of disability.

Step 2: Engagement and needs assessment

- **Identify and engage** with potential OPDs partners.
- **Gather information from persons with disabilities** in your target communities, through dialogue with OPDs / research / feedback from existing clients with disabilities.
- **Assess the needs of persons with disabilities** and the extent to which your products, services and channels meet these.

Step 3: Internal assessment and planning

- **Conduct baseline assessment** of disability inclusion practices and capabilities (see assessment tools in the resources list below).
- **Identify gaps** and prioritize short-, medium- and long-term actions.
- **Design initial adaptations required** to start serving persons with disabilities as clients.

Step 4: Piloting & learning

- **Select locations / channels / applications** for initial pilots.
- **Make initial accessibility improvements**, focusing on low-cost solutions with greatest impact for clients (e.g. install ramps or use provide portable ramps at entrances; create client servicing area on ground floor).
- **Apply simple products and servicing adaptations** (e.g. flexible KYC processes; priority servicing at branches; provide alternatives such as digital onboarding or home visits).
- **Train staff at pilot locations** on serving clients with disabilities.
- **Start outreach through OPDs** (e.g. hold information sessions and trainings; arrange branch visits; provide hands-on support to access and use products and services).
- **Introduce procedures to collect disability data** from clients during onboarding.
- **Analyze data and collect feedback** from persons with disabilities to inform future strategies.

Use the learnings from these pilot interventions to develop **protocols, guidelines and tools** to implement accessibility improvements and servicing adaptations your networks and channels, and roll out **staff training**. Extend **disability data collection and analysis** and **deepen your collaboration with OPDs** to design further product and service enhancements. As you progress, build objectives and targets for disability inclusion into your **operating plans**, and start to integrate disability-inclusive practices within your **client servicing, client protection and HR policies and procedures**.

As you continue your journey, conduct **periodic assessments** to monitor your progress and refine your strategies through a process of ongoing improvement- **section 1.6** below includes **tools for self-assessment** and gap analysis. Use the [toolkits in chapter 4 of this guide](#) to develop action plans at each stage in your journey, and resources to support implementation.

1.6 Resources and case studies

Self-assessment tools:

- [Disability inclusion indicators aligned to Cerise+SPTF's Universal Standards for Social and Environmental Performance Management \(USSEPM\)](#). Use these indicators to assess your disability inclusion practices to identify areas for improvement and monitor progress as part of your social performance management.
- **Asian Development Bank (2025), 'Making Progress: A Self-Assessment Tool'**: a free online disability inclusion self-assessment tool for FSPs. Uses a multiple-choice survey on practices across four domains (Culture, Employment, Partnerships, Customer Services) to generate a comprehensive dashboard report with suggested actions.
- **ILO Global Business and Disability Network (GBDN), 'ILO GBDN Self-Assessment Tool'**: a free online disability inclusion self-assessment for companies in general, with a focus on inclusive employment. Uses a multiple-choice survey on practices in four areas (Fundamentals, Culture, Customer, Allyship) to generate a status report.

Case studies and examples:

- Goldstein, J. et al (2014), ['A New Financial Access Frontier: A Framework for Disability Inclusion'](#), **CFI at ACCION**: Outlines a framework for disability inclusion for FSPs developed through a pilot implementation with Fundación Paraguaya, covering: Universal Design; accessibility; reasonable accommodation; partnerships; legal frameworks, HR policy; staff training; technology solutions and client trainings.
- **Microfinance and Disability-Project in Uganda**, implemented by the Association of Microfinance Institutions of Uganda (AMFIU) with the National Union of Disabled Persons in Uganda (NUDIPU), supported by the Norwegian Association of Disabled (NAD). This pilot project found that:
 - MFIs increased the number of persons with disabilities they served without providing 'special' products or conditions for persons with disabilities.
 - This was achieved mostly through **simple and low-cost interventions**, for example, a 90-minute disability awareness and inclusion training for credit officers.

- The most important barriers to start by addressing relate to low self-esteem of persons with disabilities, and attitudes of MFI staff and management.

(Source: Bwire, F., Mukasa, G. and Mersland R. (2009), '[Access to Mainstream Microfinance Services for Persons with Disabilities; Lessons Learned from Uganda](#)', *Disability Studies Quarterly*, Vol. 29, No. 1)

- **Opportunity Bank of Uganda (OBUL)** extended its commitment to inclusive finance through the 'Mainstreaming finance for people with disability' initiative, with an initial focus on:
 - **Branch accessibility**, including ramps, lowered counters, and sign language support.
 - **Training frontline staff** to serve clients with diverse abilities.
 - **Data-driven strategies**, collecting and analyzing disaggregated data to target outreach and drive inclusive servicing improvements.
 - **Community engagement** to raise awareness, build trust, and promote financial literacy among persons with disabilities.

OBUL now serves more than 30,000 clients with disabilities, from a start-point of 200. It continues to expand its disability inclusion strategy by **scaling inclusive practices** across the branch network; **digital innovation** to reach underserved clients, **partnerships** to co-design and deliver inclusive services; and **staff development** to embed a culture of inclusion.

(Source: Opportunity International (2025), '[Using the Washington Group Short Set \(WGSS\) in Inclusive Finance: Cheat Sheet](#)')

- **Fundación Paraguaya** embarked on its journey to **embed disability inclusion** within its financial and social programs in 2012.
 - Fundación Paraguaya's approach is centered on belief in the commercial viability of clients with disabilities, with a focus on:
 - Building an inclusive culture across the organization, reinforced by awareness training for staff, and strong engagement with the disability community.
 - Building lasting partnerships with OPDs and leveraging the expertise of disability support organizations and networks.
 - Enabling persons with disabilities and their family members to access mainstream products and services through proactive outreach, accessible servicing and accommodations, rather than offering 'special' products or preferential credit conditions.
 - Developing cost-effective methodologies to integrate disability inclusion throughout its existing operations.
 - Fundación Paraguaya has seen institutional benefits through strengthened organizational culture and staff engagement, increased capabilities in inclusive design practices, and enhanced brand and reputation, as well as acquiring new customers.

(Source: Barrier-Free Finance Initiative (2025), '[From pilot to mainstream: Fundación Paraguaya's journey to serve people with disabilities \(PWD\) \(2012– 2025\)](#)')

- **Chamroeun Microfinance Plc and Good Return** implemented a joint project from 2019-2023 using a **twin-track approach** to advance access to finance for micro-entrepreneurs with disabilities in Cambodia.
 - They partnered with OPDs through all stages of project design and implementation, and collaborated with disability support organizations for capacity building support.
 - They conducted a comprehensive needs assessment with persons with disabilities to shape a targeted intervention, combining accessible financial literacy coaching and a tailored loan product.
 - In parallel, Chamroeun completed a Disability Inclusion Scorecard assessment to create a disability inclusion mainstreaming plan. This included piloting and rolling-out disability inclusion training for all staff, a branch accessibility assessment and adaptation program, and inclusive recruitment practices.
 - To ensure sustainability at the end of the project, Chamroeun incorporated the accessibility features of the tailored loan into its standard loan product, and Good Return continued to support OPD partners to provide financial coaching for persons with disabilities.

(Source: Good Return and Chamroeun Microfinance Plc (2023), [‘Finance for All: A practical guide to Disability Inclusion for Financial services Providers in Cambodia’](#), Disability Action Council of Cambodia & ACCESS Program)

- **CFI at Accion and v-shesh Learning Services** implemented a project with three partner MFIs in India, to increase outreach and inclusion of persons with disabilities. Key activities included:
 - Conducting research with clients with disabilities and FSP staff.
 - Sensitization workshops for FSP board and leadership teams, and training for FSP staff through a training of trainers (ToT) approach.
 - Partnerships with OPDs, providing capacity-building training, and targeted outreach.
 - Collecting disability data from clients, and incorporating this in application forms and MIS systems.
 - Including the number of clients with disabilities in branch and MFI performance dashboards.
 - Accessibility audits in sample FSP branches and offices
 - Developing accessibility solutions, accommodations, and process improvements using Universal Design principles.
 - Providing key client documents in accessible formats and channels, training front-line staff in sign-language, and making all client workshops, trainings and group meetings inclusive.
 - Creating policies and procedures for recruitment of persons with disabilities.
 - Creating checklists, manuals and tools for FSP staff to sustain disability inclusion measures.

(Source: Access Development Services and UNDP (2014), [‘Financial Inclusion of Excluded Segments - Learning from Experience Delivery of Financial Services to People with Disabilities’](#))

CHAPTER 2: INTRODUCTION TO DISABILITY INCLUSION

Addressing disability inclusion in financial services requires a clear understanding of what disability is and how it interacts with environments, systems, and products. This introductory chapter provides financial inclusion actors with an overview of key disability inclusion definitions, concepts, and principles. Links to additional resources are provided for those who wish to explore these topics in more detail.

2.1 Overview: situation of persons with disabilities worldwide

Info box: Key Global Disability Statistics:

- **16% of the global population** are living with disabilities (World Health Organization (WHO)¹)
- **20% of the world's poorest people** are persons with disabilities (United Nations (UN)²)
- **80%** of persons with disabilities live in **developing countries** (UN³)
- In low- and middle-income countries, **up to 75% of persons with disabilities are women** (UN Women⁴)
- **46% of people aged 60 and over** live with a disability (UN⁵)
- UN data suggest that in many developing countries, **80–90% of working-age persons with disabilities are unemployed.** (UN⁶)

Persons with disabilities make up a significant proportion of the global population- an estimated **1.3 billion people, or 1 in 7 people worldwide**, are living with a disability. Yet persons with disabilities are consistently among the most marginalized groups, are more likely to experience poverty, and face barriers in accessing education, employment, healthcare and other services, including financial services. This systemic exclusion arises from physical, institutional, social and attitudinal barriers that limit their participation on an equal basis with others.

1 World Health Organization (2022), '[Global report on health equity for persons with disabilities](#)'

2 United Nations Department of Economic and Social Affairs (n.d.), '[Factsheet on Persons with Disabilities](#)', accessed 19 February 2026

3 Ibid.

4 UN Women (2017), '[Making the SDGs count for women and girls with disabilities](#)'

5 United Nations Department of Economic and Social Affairs (2024), '[Ageing and Disability](#)', accessed 19 February 2026

6 United Nations Department of Economic and Social Affairs (n.d.), '[Disability and Employment](#)', accessed 19 February 2026

2.2 Understanding disability

2.2.1 What is disability?

Contemporary understandings of disability are grounded in the [United Nations Convention on the Rights of Persons with Disabilities \(UNCRPD\)](#), which defines disability as resulting from:

“the **interaction** between **persons with impairments** and **attitudinal and environmental barriers** that **hinders their full and effective participation** in society on an equal basis with others.”

- **Impairment** refers to a loss, limitation or difference in an individual’s bodily function, that may be **physical, sensory, intellectual or mental**.
- **Disability** arises where **systems, services or attitudes** fail to accommodate these differences, creating a **barrier** that prevents individuals from participating fully and equally.

Unlike impairments, which are often long-term or irreversible, the causes of disability are largely reversible, as they can be addressed through the identification and removal of barriers. A simple way to conceptualize disability and disability inclusion is through the following formulation derived from the UNCRPD:

Impairment + barriers = disability

Impairment + accessible environment = inclusion

In some cases, impairments exist from birth, but the majority of impairments are **acquired** during a person’s lifetime, for instance due to accidents, wars, illness, traumatic events, poor healthcare or nutrition, or ageing. Disability could affect any one of us or our family members, friends, colleagues or clients, at any time.

Persons with disabilities may use **assistive devices** or **assistive technologies** to mitigate the effects of impairments. However, barriers in the environment can prevent these from working. For example:

- A person with a mobility impairment uses a wheelchair as an assistive device, but can’t enter a building because it has steps with no ramp provided.
- A person with visual impairment uses a screen reader, an assistive technology that converts text on a website into spoken format. If the website is not designed to be compatible with screen readers, she can’t access it.

2.2.2 Types of impairments

The UNCRPD states that: “Persons with disabilities include those who have **long-term physical, mental, intellectual or sensory impairments** which in **interaction with various barriers** may hinder their full and effective participation in society on an equal basis with others.”

The categorization used in the UNCRPD of “physical, mental, intellectual or sensory impairments” is intentionally broad and inclusive.

- **Physical impairments** may affect mobility, dexterity, strength, endurance, or coordination. Examples include mobility impairments, and motor impairments (which affect the ability to move, reach or maintain posture).
- **Sensory impairments** affect how a person receives information from their environment. Examples include visual impairments, hearing impairments and speech impairments.
- **Intellectual impairments** refer to limitations in intellectual functioning such as reasoning and problem-solving, or adaptive behavior.
- **Mental impairments** relate to the emotional, perceptual, cognitive or behavioral effects of mental health conditions such as depression, bipolar disorder, schizophrenia or anxiety disorders. Terminology varies by context; in this guide, psychosocial disability refers to barriers experienced by people with mental health conditions in interaction with their environment.

Other commonly-used terms such as **cognitive impairments, learning difficulties, developmental disabilities, or neurodivergence** (e.g. autism, Attention-deficit/hyperactivity disorder (ADHD)) are generally considered to fall under intellectual and/or psychosocial disabilities, depending on functional impact and context.

There is no universal consensus on how types of impairments should be presented or categorized, and preferences may vary across contexts. This guide adopts language aligned to the UNCRPD, while acknowledging that different organizations and individuals, including persons with disabilities, may prefer different terminology.

For financial services providers (FSPs), the categorization is less important than recognizing that persons with disabilities are not a homogeneous group, and that persons with different types of impairments encounter different barriers, and require different solutions. In addition, many people experience **multiple impairments**, such as a combination of physical and sensory impairments, or psychosocial and cognitive impacts, and many impairments are **invisible** (i.e. not immediately apparent to others). FSPs should therefore avoid ‘one-size-fits-all’ approaches and ensure flexibility and choice in client interactions.

Table 3 Examples of inclusive financial services delivery

Types of impairments	Examples (non-exhaustive)	Typical Impact	Implications for financial services delivery
Physical and mobility	Wheelchair user, limb loss, cerebral palsy, severe arthritis	Ability to move, reach, or maintain posture	Step-free access, non-slippery floors, wider doors, rails, parking space; accessible counters and ATMs; seating availability; adaptable verification and authentication processes
Sensory	Blind/low vision, deaf/hard of hearing, deaf blindness	Ability to receive, process, or communicate information	Screen reader-compatible digital channels; captions and transcripts; larger fonts and clear color contrasts; sign-language or visual alternatives; tactile or audio cues; well-lit rooms and ATMs.
Neurodiversity, Intellectual and developmental	Dyslexia, dyscalculia, ADHD, autism spectrum, Down syndrome	Unusual or limiting Information processing, learning, decision-making	Plain and Simple language; supported decision-making; longer or flexible appointments; multiple formats; quiet or low-stimulus options; flexible authentication
Psychosocial	Depression, bipolar, anxiety, PTSD, schizophrenia	Emotional regulation, concentration, social interaction	Non-stigmatizing policies; flexible repayment or collections practices; crisis-aware and trained staff; privacy-respecting engagement
Invisible	Chronic illness, Diabetes, epilepsy, HIV, chronic pain, TBI/ABI	Fluctuating energy, cognition, or physical functioning that may not be immediately recognized as such by others	Remote and digital access options; time flexibility; fatigue-aware processes; seizure-safe environments; recognition without forced disclosure

The implications for financial services delivery are explored in more detail in **Chapter 4** of this guide.

2.2.3 Models of disability

Over time, different models of disability have emerged that reflect how societies understand and respond to disability. Four commonly referenced models are listed below, each reflecting distinct assumptions about the causes of disability and the most appropriate forms of intervention:

- **the charity model:** Sees disability as an individual affliction, and persons with disabilities as vulnerable and in need of care, requiring support such as welfare assistance or donations.
- **the medical model:** Sees disability as a health issue that needs to be addressed through medical management (rehabilitation, treatment etc.) to fix the ‘problem’.
- **the social model:** Sees disability as a result of societal barriers that can be addressed by removing these barriers through accessibility and awareness.
- **the human rights model.** Sees disability as a matter of equality, dignity and rights that should be addressed through laws and policies requiring all actors in society to take accountability for enabling the active participation of persons with disabilities.

The most significant shift in contemporary disability inclusion has been the move away from **medical and charity-based models**, which focus primarily on individual impairments, toward **social and human-rights-based models**, which focus on removing barriers, discrimination, and systemic exclusion. The UNCRPD, and this guide, is grounded in social- and human rights-based approaches.

2.2.4 Intersectionality

Disability does not exist in isolation. Persons with disabilities experience different and often compounded forms of exclusion, depending on factors such as their gender, age, socio-economic status, ethnicity, migration or displacement status, and geographic location.

Intersectionality means recognizing that people hold multiple identities simultaneously based on disability, gender, age, ethnicity, religion, sexual orientation, social status, or geographic location, and that it is the intersection of these identities that shapes lived experiences. Intersectionality provides a lens to understand the root causes of compounded disadvantage, and to design appropriate responses.

Info box: Disability, gender and age

Women and girls with disabilities, in particular, often face multiple and intersecting forms of exclusion, arising from both their gender and their disability. For instance, women with disabilities face heightened risks of violence, abuse, and harmful practices such as forced sterilization, and encounter greater barriers to accessing education, employment and services than women without disabilities, or men with or without disabilities. Women with disabilities are often expected to perform unpaid care and domestic work in the home, reducing opportunities for economic participation. Similarly, unpaid work restricts economic opportunities for caregivers of persons with disabilities, with social norms dictating that mothers or other female household members are the primary caregivers.

Old age and disability: Older persons have a high likelihood of experiencing disability. Older persons with disabilities face discrimination through a combination of ageism and ableism, and have a high risk of income insecurity. Those who became disabled earlier in life often had lower earnings as a result, while those who acquire impairments through ageing may not identify as a person with a disability, and miss out on social welfare benefits.

Youth and disability: Young persons with disabilities experience significant economic exclusion and insecurity. In 2021, almost half of youth with disabilities aged 15-24 worldwide were not in employment, education or training (NEET), compared to 25% of youth without disabilities⁷.

2.3 Principles of disability inclusion

Disability inclusion means realizing the right of persons with disabilities, and their parents/ caregivers, to **participate fully** in all aspects of life, on an **equal basis with others**. This requires intentional action to **identify and mitigate barriers** that prevent or hinder them from exercising this right. This section explores core principles articulated in the UNCRPD that underpin disability inclusion.

2.3.1 Participation

The principle of “**Nothing About Us, Without Us**” is central to the disability rights movement. This means that no decisions affecting the lives of persons with disabilities should be taken without their direct participation. The UNCRPD states that persons with disabilities should be able to participate in decision-making processes through their representative **organizations of persons with disabilities (OPDs)**.

Following this principle, programs and initiatives for disability inclusion require the active involvement of persons with disabilities, their parents/caregivers, and OPDs at all stages, including during inception, design, planning, implementation, monitoring and evaluation. In practice, this requires taking proactive steps to enable their participation, for instance by using accessible venues, providing support for transportation, using accessible information and communication formats, providing accommodations, and compensation of participation costs.

This engagement improves relevance, effectiveness, and accountability, helps to identify barriers that may otherwise be overlooked, and ensures that solutions reflect lived experience of persons with disabilities, rather than assumptions.

Some groups of persons with disabilities, including those with cognitive or speech impairments, psychosocial disabilities, and those who are deaf or deafblind, often face additional barriers to participating in decision-making and may be overlooked as a result. It is important to use targeted strategies and provide appropriate accommodations to reach these groups and enable their participation.

⁷ UN Department of Social and Economic Affairs (DESA) (2024), [‘Disability and Development Report 2024’](#)

2.3.2 Accessibility

The UNCRPD recognizes accessibility as a precondition for independent living, full participation and inclusion of persons with disabilities. It means ensuring that persons with disabilities have equal access to the physical environment, transportation, information and communications (including information and communication technologies (ICT)), and to all facilities and services open to or provided to the public, in both urban and rural areas.

In practice, this requires identifying and removing barriers, developing and monitoring accessibility standards, and practical measures such as training, accessible signage, provision of assistive devices and services, accessible information formats, and inclusive digital design. Further guidance on accessibility measures related to financial services provision is provided in **section 4.3** of this guide.

2.3.3 Universal Design

The concept of Universal Design (also referred to as Design for All, inclusive design, or barrier-free design) is closely linked with accessibility.

The UNCRPD defines **Universal Design** as:

“the design of products, environments, programs, and services to be **usable by all people**, to the greatest extent possible, **without the need for adaptation or specialized design**, while recognizing that assistive devices may still be required for some individuals.”

The seven principles of Universal Design⁸ are:

- 1. Equitable Use:** The design is useful and marketable to people with diverse abilities.
- 2. Flexibility in Use:** The design accommodates a wide range of individual preferences and abilities.
- 3. Simple and Intuitive Use:** Use of the design is easy to understand, regardless of the user’s experience, knowledge, language skills, or current concentration level.
- 4. Perceptible Information:** The design communicates necessary information effectively to the user, regardless of ambient conditions or the user’s sensory abilities.
- 5. Tolerance for Error:** The design minimizes hazards and the adverse consequences of accidental or unintended actions.
- 6. Low Physical Effort:** The design can be used efficiently and comfortably and with minimal fatigue.
- 7. Size and space for approach and use:** Appropriate size and space are provided for approach, reach, manipulation, and use, regardless of user’s body size, posture, or mobility.

2.3.4 Reasonable accommodation

Reasonable accommodation differs from general accessibility measures in that it responds to individual circumstances, rather than applying to all users. While accessibility aims to remove barriers at a systemic level, reasonable accommodation enables equitable access in specific situations where existing systems do not fully meet an individual’s needs.

⁸ Centre for Excellence in Universal Design (n.d.), [‘The 7 Principles’](#)

Reasonable Accommodation is defined by the UNCRPD as:

“necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms.”

The assessment of whether adjustments impose an undue cost or burden is relative to the size and resources of the organization.

2.3.5 Respect and dignity

Inclusion goes beyond providing an accessible environment. It is also about how people are welcomed, listened to, and engaged.

Inclusion requires treating all individuals, including persons with disabilities, with equal respect for their dignity. This includes following **disability etiquette**, using **respectful, inclusive language**, avoiding stereotypes, and ensuring client interactions are conducted in a way that recognizes their **individual autonomy and choice**.

Disability etiquette refers to practices and behaviors that support respectful and inclusive interaction with persons with disabilities, respecting their dignity and autonomy, including their right to make decisions, to accept or decline assistance, and to be addressed directly.

Respectful language plays an important role in promoting dignity, inclusion and trust. Respectful, appropriate and inclusive language recognizes persons with disabilities as individuals first and avoids reinforcing stereotypes or stigma.

Info box: Disability Etiquette: key principles for respectful interaction:

- **Treat people as individuals**, not as representatives of a disability.
- **Speak directly** to the person, not to an accompanying individual or support person.
- **Ask before offering help**, and respect the response.
- **Use clear, respectful language** and avoid making assumptions about ability or needs.
- **Respect autonomy and choice**, including independent decision-making and consent.
- **Be patient and attentive**, allowing time where needed.
- **Focus on accessibility, not sympathy**. Avoid pitying or patronizing behavior.

Info box: Respectful and Inclusive Language

The use of language relating to disability varies between countries and contexts, and individual persons with disabilities may have different preferences. This information gives a brief overview, but should be adapted to local contexts and the individual's preference.

- Use **person-first** language as standard e.g. “person with a disability”.
- Use **identity-first** language e.g. “disabled person” if preferred by the individual or OPD.
- **When in doubt, ask**, or follow the language of the person or OPD concerned.
- **Avoid language** that defines people by their impairment or implies incapacity, dependency or pity (e.g. “suffers from”, “victim of”, “the disabled”).
- Use **neutral, factual and respectful terms** when referring to disability in policies, forms and communications.
- **Focus on barriers and environments**, not deficits, when discussing accessibility issues- e.g. refer to “inaccessible digital platforms” rather than “clients unable to use technology”.
- Ensure respectful language is **used consistently** across all client-facing materials, internal policies and staff training.

2.3.6 Equality of access and outcomes

In designing inclusive practices, it is important to focus on **equality of access and outcome (equity)**, rather than equal treatment.

- **Equal treatment** focuses on creating processes that treat everyone in the same way, regardless of differences in needs or circumstances.
- **Equity** recognizes that individuals and groups have **different needs** and therefore require different levels or types of support to **access the same opportunities**, and achieve **comparable outcomes**.

In the context of disability inclusion, providing identical processes and services to all clients may unintentionally perpetuate exclusion if those services are inaccessible to persons with disabilities.

Inclusion requires removing barriers, introducing flexible approaches, and providing reasonable accommodations to ensure equality of access and opportunities for everyone.

2.3.7 Non-discrimination

Discrimination occurs when a person is **excluded or treated less favorably** than another person on the **basis of their personal characteristics or attributes**, either intentionally or unintentionally.

Protected categories (also called **protected attributes or grounds**) against which discrimination is prohibited under international human rights include (but are not limited to): sex; gender; sexual orientation; age; race / ethnicity / national origin; disability; health status (including HIV/AIDS status); social origin / caste; socio-economic status; religion; political opinion or affiliation; and trade union membership. Since everyone holds one or more of these characteristics, prohibiting discrimination protects all individuals, not only minority groups.

The UNCRPD states that **discrimination on the basis of disability** includes any “**distinction, exclusion or restriction on the basis of disability**” that prevents or restricts the recognition, enjoyment and exercise of all human rights and fundamental freedoms on an equal basis with others, including through “**denial of reasonable accommodation**”.

Legal and human rights frameworks recognize that **discrimination is not limited to intentional acts**. It can also arise from policies, practices, or behaviors that appear neutral but disproportionately disadvantage certain groups.

- **Direct discrimination** occurs where a person is treated less favorably explicitly because of their personal characteristics (e.g. an FSP refuses to open an account for a client because they have an intellectual impairment).
- **Indirect discrimination** occurs where a policy or rule is applied to all persons, but puts persons with a particular characteristic at a disadvantage (e.g. mandating in-person branch visits for certain transactions, which disproportionately excludes clients with mobility impairments, and not providing reasonable accommodations to enable individual clients with disabilities to carry out transactions).

For FSPs, discrimination may be manifested in interactions with clients and employees, product design and eligibility criteria, service delivery, communications, or internal policies.

Info box: Why Discrimination Occurs

Discrimination is often rooted in a range of social and psychological factors. These include **conscious and unconscious biases** that shape assumptions about individuals or groups, **stereotypes** that misrepresent or generalize characteristics, and **stigma** attached to certain identities or attributes. Discrimination may also stem from **prejudice** and fear of difference, as well as from **ignorance** which can lead to misunderstanding and misinformation. In many contexts, **cultural beliefs and social norms** normalize exclusion and unequal treatment.

When these factors result in adverse attitudes and behaviors, this can affect **institutional practices**, including how services are designed, how decisions are made, and how people interact on a daily basis, creating systemic discrimination, even in the absence of intent.

2.3.8 Twin-track approach to disability inclusion

The twin-track approach is a widely recognized strategy for advancing disability inclusion. It combines two complementary approaches: **mainstreaming disability inclusion** across all systems, and providing **targeted support** to empower persons with disabilities and address specific barriers to access and usage.

Mainstreaming means designing environments, policies systems, products and services so that they are inclusive for everyone. While this remains the ultimate goal of inclusion, **targeted interventions** are often necessary to empower groups that have been systematically excluded, and therefore require specific measures to access equal opportunities. At the same time, some groups and individuals, including persons with disabilities, will continue to face distinct barriers that call for **targeted measures** to address these.

Relying solely on mainstreaming risks overlooking specific needs and barriers, while focusing only on targeted interventions can perpetuate segregation rather than inclusion.

2.3.9 Strengths-based approach to disability inclusion

A strength-based approach focuses on the **abilities, aspirations, and agency** of persons with disabilities, rather than on perceived limitations. It recognizes persons with disabilities as both **rights-holders and active economic agents**, rather than passive recipients of support.

For FSPs, this means viewing persons with disabilities as **economically viable clients** with diverse financial needs and preferences, and **capable employees and partners** with valuable skills. Barriers to access and participation are seen not as individual deficits, but as systemic design challenges.

Inclusion is achieved by engaging with persons with disabilities and OPDs in **participative processes to co-design solutions** that promote autonomy, informed choice, and meaningful participation, supported by reasonable accommodations where needed.

CHAPTER 3: FINANCIAL SERVICES CONTEXT

3.1 The business case for disability-inclusive financial services

Disability inclusion is not only a human rights imperative; it also makes strong business sense. For FSPs, embracing disability inclusion supports growth, innovation, risk management, staff engagement, productivity, and long-term sustainability, as well as aligning with the broader social agenda.

3.1.1 Social mission and external reputation

Equitable inclusion of persons with disabilities and the principle of “Leaving No One Behind” are overarching principles of the 2030 Agenda for Sustainable Development. FSPs play a critical role in enabling individuals’ economic participation, autonomy, and resilience, and driving sustainable economic growth. Institutions that actively champion disability inclusion are perceived as responsible and values-driven, strengthening trust among clients, investors, regulators, and the wider public.

3.1.2 Business growth

Persons with disabilities represent 16% of the global population, approximately 1.3 billion people, and are represented in all population groups, yet they remain significantly underserved by financial institutions. This represents a substantial and largely untapped market opportunity. The estimated spending power of persons with disabilities and their family and close friends is \$18.3 trillion annually⁹. In the UK alone, it is estimated that the business of persons with disabilities and their households is worth £274 billion per year – and banks or building Societies lose £935 million income per year by not being accessible¹⁰.

3.1.3 Improved experience for all clients

Adopting Universal Design principles and investing in accessibility results in better services for everyone. Improving the usability of physical environments, digital platforms, information and processes benefits all users, including older persons, people with temporary impairments, pregnant women, persons with low literacy or digital skills, and caregivers. For example:

- **Physical accessibility:** curb cuts and ramps are essential to wheelchair users, but also benefit older persons, parents with strollers, travelers with luggage, and delivery personnel.
- **Information accessibility:** subtitles and closed captions, initially designed for persons with hearing impairments, are now widely used by many people (e.g. around 40% of Netflix users regularly rely on them).
- **Digital accessibility:** clear screen layouts, user-controllable settings (for fonts, color contrasts and magnification), simple language, and alternatives to text (e.g. voice commands) improve usability for everyone, including older persons and persons with low levels of literacy.

⁹ The Return on Disability Group (2024), [‘Global Economics of Disability Report: 2024’](#)

¹⁰ Purple (n.d.), [‘The Purple Pound’](#), accessed 19 February 2026

3.1.4 Promoting innovation

Many solutions designed for disability inclusion have become mainstream innovations. Examples of widely-used technologies that originated as accessibility solutions include keyboards; closed captions, automatic doors; voice recognition; speech-to-text tools and text-to-speech functions.

3.1.5 Organizational culture and access to talent

Inclusive workplaces are associated with higher employee engagement, motivation, and retention. Hiring persons with disabilities brings diverse perspectives, problem-solving approaches, and resilience into teams, strengthening overall organizational performance. Research by Accenture and Disability:IN¹¹ found companies that are leaders in disability inclusion outperform their peers on productivity and achieve higher revenue, net income, and profit.

3.1.6 Risk mitigation and regulatory compliance

Failure to address accessibility and inclusion can expose institutions to legal, regulatory, financial and reputational risks. As disability inclusion becomes more embedded in national regulations, consumer protection frameworks, and Environmental, Social, and Governance (ESG) standards, non-compliance may result in legal disputes, fines, exclusion from public procurement or funding, and reputational damage. For example, the European Accessibility Act (2019), requires financial services providers and digital payment platforms to meet accessibility requirements, including for websites, mobile applications, ATMs, payment terminals, and e-commerce services.

3.1.7 Long-term sustainability

The population of persons with disabilities is predicted to increase significantly in the future, in particular in countries with rapidly ageing populations. By 2025, it is predicted that 22% of the global population will be aged 60 or over¹², with about half of this group having a disability. In this context, building disability-inclusive financial systems becomes a strategic positioning for FSPs.

11 Disability:IN and Accenture (2023), [‘The Disability Inclusion Imperative Report Executive Summary’](#)

12 UN Department of Economic and Social Affairs (n.d.), [‘Ageing and Disability’](#), accessed 19 February 2026

3.2 Disability and financial exclusion

Persons with disabilities worldwide and their caregivers experience disproportionate financial exclusion, as a result of structural barriers that limit their access and usage of financial services. Solutions to address these barriers already exist, but have not yet been combined and deployed systematically to advance the financial inclusion of persons with disabilities at scale.

3.2.1 Demand-side barriers

- **Lower levels of financial literacy and confidence**, often resulting from exclusion from education systems, lack of information in accessible formats, and limited exposure to financial services. This is frequently compounded by experiences of discrimination by FSPs, which undermine trust and willingness to engage with financial institutions.
- **Digital exclusion:** With the rapid digitization of financial services, the ability to access and use digital technologies is becoming an essential precursor to financial inclusion. Persons with disabilities are amongst the most digitally excluded groups, as a result of inaccessible digital interfaces, limited access to devices, lack of knowledge of or access to assistive technologies, and low digital skills¹³. These barriers are reinforced by social norms and attitudes that limit their online participation, in particular for women with disabilities¹⁴.
- **Informal or self-employment:** Many persons with disabilities turn to informal employment or self-employment as a means of economic participation, due to barriers to accessing formal labor markets. In developing countries, 50% of employed persons with disabilities are self-employed and 54% work in the informal sector, compared to 41% and 47% respectively for employed persons without disabilities¹⁵. Informality limits access to regulated financial products, and documentation required by financial institutions.
- **Lack of collateral:** Persons with disabilities are less likely to own assets such as land or property, creating a further barrier to accessing credit¹⁶. Women with disabilities are particularly affected, as they may also experience legal or cultural barriers to property ownership on the basis of their gender. Young persons with disabilities also face additional age-related barriers to asset ownership and collateral access.

3.2.2 Supply-side barriers

Persons with disabilities' access to and use of financial services is limited by supply-side barriers that operate and reinforce one another across **two levels: systemic barriers** within the broader financial ecosystem (including governments, regulators, inclusive finance networks, impact investors, etc.), and **institutional barriers** at the individual FSP level.

13 GSMA (2020), [‘The Mobile Disability Gap Report 2020’](#)

14 GSMA (2020), [‘The Digital Exclusion of Women with Disabilities: A Study of Seven Low- and Middle-Income Countries’](#)

15 UN Department of Social and Economic Affairs (DESA) (2024), [‘Disability and Development Report 2024’](#)

16 Handicap International (2006), [‘Good Practices for the Economic Inclusion of People with Disabilities in Developing Countries’](#)

Systemic barriers

- **Low awareness amongst inclusive finance actors:** Many financial sector stakeholders have limited awareness of disability inclusion as an integral component of financial inclusion, despite the widespread financial exclusion of persons with disabilities. As a result, financial inclusion strategies that aim to reach “vulnerable” or “underserved” populations frequently overlook persons with disabilities¹⁷.
- **Lack of disability-disaggregated data:** The absence of reliable and comparable disability-related data within financial systems significantly limits evidence-based programming. Without data on financial access, usage, needs and outcomes of persons with disabilities, it becomes difficult to design or monitor disability inclusion interventions. This lack of visibility reinforces the exclusion of persons with disabilities from financial inclusion agendas, strategic priorities, and budget allocations. For instance, the widely-used Global Findex measures gaps in financial inclusion by population sub-groups, but does not collect disability disaggregated indicators, as many countries do not yet include standardized disability questions in major surveys.
- **Weak linkages between sectors:** There is often little interaction between inclusive finance stakeholders and the disability sector, including OPDs. This disconnect reduces opportunities for alignment between financial inclusion efforts and the lived experience of persons with disabilities.
- **Limited policy and regulatory frameworks:** In many countries, disability inclusion is not explicitly addressed in national financial inclusion strategies, consumer protection frameworks, or supervisory guidelines. For example, a survey by the Alliance for Financial Inclusion (AFI) of its member central banks and regulators found that only 16 out of 53 countries with a national financial inclusion strategy included explicit measures for financial inclusion of persons with disabilities within this¹⁸. Where policies exist, they may lack enforcement mechanisms, clarity, or operational guidance to incentivize FSPs to comply.
- **Legal barriers:** The UNCRPD recognizes the **legal capacity of persons with disabilities**, and their right to access financial services (including credit) and **control their own financial affairs** on an equal basis with others. However, this principle is not uniformly reflected in national legislation. Some countries’ laws effectively restrict the right of persons with disabilities, or women with disabilities in particular, to access financial services, by:
 - **Restricting or prohibiting** them from entering contracts or owning or inheriting property.
 - **Prohibiting FSPs** from providing them with financial products and services.
 - Requiring the use of **substitute decision-making mechanisms**, such as guardianships, in which third parties take decisions on their behalf.

Even where such legal restrictions do not exist, **some FSPs adopt policies with similar restrictions or exclusions** based on medical conditions, diagnoses or types of impairments. These policies, often based on misconceptions of persons with disabilities as more risky clients, discriminate against persons with disabilities and deny them their rights.

17 Puli, L. et al (2024), ‘[Financial inclusion for people with disability: a scoping review](#)’, Global Health Action, 17:1, 2342634, DOI: 10.1080/16549716.2024.2342634

18 Alliance for Financial Inclusion (2023), ‘[Financial Inclusion for Persons with Disabilities](#)’.

Institutional barriers

At the FSP level, barriers to access arise from how financial services are designed, delivered, and experienced by clients¹⁹. These include:

- **Physical barriers:** Inaccessible branches, automated teller machines (ATMs), and service points (e.g. due to steps without ramps, narrow entrances, high counters, or poorly designed layouts and ATM screens), can prevent persons with mobility or sensory impairments from accessing services independently. For example, about 30% of banks and almost half of ATMs in developing countries are not accessible to wheelchair users, with little change since 2018²⁰.
- **Digital barriers:** Digital financial services have the potential to overcome many physical barriers to access. However, digital interfaces are often inaccessible in design. Issues such as complex interfaces, small fonts, non-accessible authentication methods and incompatibility with assistive technologies can exclude users with sensory, cognitive, or motor impairments. According to a scan of 40 000 enterprise websites by AudioEye in 2024, only 3% of the web is considered accessible²¹.
- **Information and service delivery barriers:** Information is frequently provided in formats that are not accessible to persons with different types of impairments, such as small print, complex language, or audio-only channels. Limited availability of alternative formats (e.g. braille, easy-to-read, sign language, captions), inflexible service processes, and lack of choice in service delivery methods can limit access for persons with disabilities.
- **Social and attitudinal barriers:** Lack of awareness, negative attitudes and stereotypes about disability among FSPs staff can be one of the most significant causes of exclusion. FSP staff often perceive persons with disabilities as more 'risky' clients, though there is no evidence that their repayment behaviors are different from persons without disabilities²², and some studies have shown lower default rates amongst borrowers with disabilities²³. Assumptions about the capacity or risk profile of persons with disabilities, overprotective behaviors, or social stigma may result in discrimination, rejection of credit applications, denial of services, or exclusion from decision-making.
- **Policy barriers:** Discriminatory attitudes and assumptions may also be reflected in FSPs' policies. These include direct discrimination such as eligibility exclusions or restrictions based on types of impairments or medical diagnoses, and indirect discrimination through inflexible procedures with no accommodations provided (e.g. no alternatives to written signatures for customer identification and authorizations).

19 Sightsavers (2023), '[Financial Inclusion for Persons with Disabilities in Kenya: A Rapid Review and Qualitative Study Report](#)'

20 UN Department of Social and Economic Affairs (DESA) (2024), '[Disability and Development Report 2024](#)'

21 Jensen, M. (2024), '[Web Accessibility Stats and Data 2024](#)', AudioEye, accessed 19 February 2026

22 Barrier-Free Finance initiative (2025), '[From pilot to mainstream: Fundación Paraguaya's journey to serve people with disabilities \(PWD\) \(2012–2025\)](#)'

23 Rubio, L.,J., Galvez-Sánchez, Molina, E.J., Moreno, V. et al. (2025), '[Analysing credit risk in persons with disabilities as an instrument of financial inclusion](#)'. J. Soc. Econ. Dev. 27, 581–603

3.3 Financial needs and vulnerabilities of persons with disabilities

Persons with disabilities have the same underlying financial needs as other FSP clients, including managing expenditure, smoothing irregular cashflows, investing in livelihood opportunities, and reducing the impact of financial shocks. However, within these categories, persons with disabilities often experience specific patterns of needs, risks and vulnerabilities, resulting from systemic and intersectional barriers.

- **Access to finance and support for entrepreneurship:** Many persons with disabilities engage in self-employment or entrepreneurship, but face barriers to accessing credit to invest in their business, including a lack of collateral. Access to collateral-free credit and complementary services such as business management or entrepreneurship training are key enablers for persons with disabilities to build sustainable livelihoods.
- **Managing higher and irregular costs:** Persons with disabilities face additional and recurring expenses that are directly or indirectly linked to disability (see Information box “Cost of disability”). Such costs are often unpredictable, creating a need for financial products, tools and trainings that support budgeting, cashflow management, and resilience. This could include easier access to savings products, as well as affordable short-term credit.

Info box: The Cost of Disability

Disability is associated with higher living costs as well as lower income. Many persons with disabilities incur additional expenses related to assistive devices, healthcare, medication, personal assistance, transportation, and accessible housing or technology²⁴. These costs are rarely fully covered by social protection schemes, where these exist. As a result, households that include persons with disabilities may experience greater financial stress, even when income levels appear comparable to those without disabilities.

- **Insurance and risk protection:** Persons with disabilities are often exposed to higher risks of health emergencies and loss of income, are more vulnerable to disasters, and face particular risks such as damage to assistive devices. Yet they are frequently excluded from insurance markets, or offered products that are unaffordable or poorly adapted to their needs. Equitable access to inclusive health-, life-, and micro-insurance products plays an important role in enhancing financial resilience and independence for persons with disabilities.
- **Exploitation and abuse:** Persons with disabilities of all ages and genders experience higher rates of physical, sexual and emotional abuse, with women and girls with disabilities particularly at risk²⁵. This heightened vulnerability arises from social isolation, communication barriers, and dependency on caregivers or family members which creates power imbalances. Unequal power dynamics and inadequate safeguarding mechanisms can also make persons with disabilities vulnerable to abuse or harassment in the workplace, or in interactions with FSP staff.

24 Mitra, S., et al, (2017) ‘[The hidden extra costs of living with a disability](#)’, The Conversation, 26 July 2017

25 UNICEF (2025), ‘[Global Disability Inclusion Report Accelerating Disability Inclusion in a Changing and Diverse World](#)’

- **Financial abuse, fraud and exploitation:** Persons with disabilities may face increased risks of financial abuse, fraud or exploitation, particularly when they are forced to rely on third parties to access or manage their finances due to inaccessible or discriminatory financial systems. This dependence can reduce privacy, limit decision-making power, and increase exposure to undue influence, coercion, or misuse of funds.
- **Gender-based violence (GBV):** Women with disabilities face a higher risk of GBV, a vulnerability that is further exacerbated in situations of crisis, conflict, or displacement. FSPs that work with populations at high risk of GBV should take proactive steps to ensure women with disabilities are fully included in their interventions. This includes identifying, understanding, and responding to their specific risks and needs, and ensuring that services are accessible, safe, and appropriate.
- **Climate-change impacts and emergencies:** Persons with disabilities are particularly vulnerable to the impacts of climate-change. They also experience greater risk during disasters and emergencies, as they may be unable to access critical information, move away from danger, or access support services. In many cases, their needs are not considered in disaster risk management and emergency plans, and they are often overlooked during responses²⁶. FSPs should identify and respond to the specific risks faced by persons with disabilities when creating organizational contingency plans, and when designing products and services to help clients to mitigate climate-related impacts.

3.4 Legal and policy frameworks

3.4.1 The UN Convention on the Rights of Persons with Disabilities (UNCRPD)

The UNCRPD is the cornerstone of the international disability rights framework, and shapes how disability rights are interpreted, implemented, monitored, and enforced across different international, regional and national instruments.

193 countries have ratified or acceded to the UNCRPD since its adoption in 2006, obligating them to adopt and enforce laws and policies to protect, promote and fulfil the rights of persons with disabilities.

Info box: Why the UNCRPD Matters

- **It recognizes persons with disabilities as rights-holders:** Persons with disabilities have the right to make decisions about their own lives, and are recognized as equal before the law.
- **It establishes a global standard,** centered in a social and rights-based model.
- **It defines universal principles** that underpin disability inclusion, including accessibility, Universal Design, and reasonable accommodation.
- **It recognizes responsibilities of both public and private sector actors** to identify and remove social and environmental barriers to enable persons with disabilities to access their rights.
- **It guides practice,** providing a normative framework for disability-inclusive policies, standards, and service design.

²⁶ Lewis, D. and Ballard, K., '[Disability and Climate Change: Understanding vulnerability and building resilience in a changing world](#)', CBM

Several articles of the UNCRPD are of particular relevance to FSPs, both as service providers and as employers:

- **Article 5: Equality and non-discrimination:** prohibits all discrimination on the basis of disability, and requires provision of reasonable accommodation.
- **Article 9: Accessibility:** requires measures to ensure accessibility of physical environments, information, communications and services, including those provided by private sector entities.
- **Article 12: Equal Recognition Before the Law:** affirms that persons with disabilities have legal capacity on an equal basis with others; the right to exercise that capacity, including by controlling their own financial affairs; and the right to receive the support they require to exercise their legal capacity.
- **Article 21: Freedom of Expression and Access to Information:** requires measures to ensure private entities offering services to the public, including through the internet, provide information and services in accessible formats.
- **Article 27: Work and employment:** affirms the right of persons with disabilities to work on an equal basis with others, and prohibits discrimination across the employment journey including recruitment, career development, working conditions, and termination. Requires the provision of reasonable accommodation in the workplace, equal access to labor and trade union rights, and fair working conditions.

While international instruments establish universal principles, regional frameworks adapt and contextualize these, and national laws translate them into binding obligations, standards, and enforcement mechanisms.

3.4.2 Regional frameworks

Regional human rights instruments and laws provide additional avenues for protection and accountability adapted to specific cultural and legal contexts, and strengthen enforcement and monitoring.

Examples of key regional frameworks and laws include:

- [The African Disability Rights Protocol \(2018\)](#), adopted by the African Union as a protocol to the 1981 African Charter on Human People's Rights. It complements and reinforces the UNCRPD while addressing region-specific issues, including the impact of armed conflict, forced displacement, and harmful practices.
- [The European Accessibility Act \(EAA\) \(2019\)](#) represents a major regulatory step toward practical inclusion, harmonizing accessibility requirements across EU Member States in alignment with the UNCRPD, with effect from June 2025. It establishes mandatory accessibility requirements and enforcement mechanisms that cover key products and services, both physical and online. These include ATMs, banking and payment services, as well as computers and smartphones, ticketing and check-in machines, transport services, e-books, e-commerce, and audiovisual and telephony services.
- [The Inter-American Convention On The Elimination Of All Forms of Discrimination Against Persons with Disabilities \(1999\)](#) obliges States parties to take measures to prevent and eliminate all forms of discrimination against persons with disabilities and to promote their full integration in all areas of life.

- The [Incheon Strategy to “Make the Right Real” for persons with disabilities](#), launched by UNESCAP in 2012, with implementation through the **Asian and Pacific Decades of Persons with Disabilities 2013–2022 and 2023-2032**. The Incheon Strategy provides a regional policy framework with 10 goals and 27 targets, setting measurable objectives on poverty reduction, employment, accessibility, and social protection, and supporting the practical implementation of disability inclusion across the region.

3.4.3 National frameworks

Since the 1990s, most countries have implemented disability-related civil rights and anti-discrimination laws, reflecting a shift from welfare-based approaches toward equality through social and rights-based frameworks. This evolution has been driven by the influence of the UNCRPD as well as disability rights movements and activism led by persons with disabilities and OPDs. This UN website provides links to [disability laws and acts by country/area](#).

Most countries’ laws **prohibit discrimination** on the basis of protected characteristics, including disability, and emphasize equality of access and opportunity. Many include enforceable obligations related to accessibility, reasonable accommodation, and equal access for persons with disabilities to employment and education, service provision and consumer protection.

National laws on **non-discrimination and equal access to employment**, including provision of **reasonable accommodation** in the workplace, generally apply to both public and private sector employers, including FSPs. Some countries have also introduced **employment quotas** requiring public and private entities above a certain size to employ persons with disabilities as a minimum proportion of their total workforce, though their enforcement in practice varies.

Non-discrimination and equality laws typically also cover **equal access to facilities and services**. Many countries have implemented laws on **accessibility of buildings** that apply to all buildings open to the public, and enforceable **standards** for the design and construction of new buildings. Increasingly, national governments are implementing laws on **accessibility of digital services**, usually linked to international standards for web accessibility. The World Wide Web Consortium (W3C) provides a list of national [web accessibility laws and policies](#).

In many countries, these legal requirements apply to **all organizations providing facilities and services to the public**, including both public and private sector entities. In some cases, there are also domain-specific laws that apply to **particular sectors**, such as transport, ICT, and banking and financial services.

3.4.4 Financial sector frameworks

Governments, central banks and regulators play an important role in creating national legal, policy, and regulatory frameworks for financial services. Historically, there have been limited measures for disability inclusion within national financial inclusion strategies or financial sector regulations. However, as the global financial inclusion agenda has increasingly focused on reaching the most marginalized populations, there is a growing recognition of the need for disability-inclusive financial systems.

A number of central banks and regulators have implemented **regulatory frameworks** requiring FSPs to implement specific measures that facilitate persons with disabilities' access to their products and services (see examples in the information box below). Financial sector regulatory bodies and industry associations also publish **guidance and standards for FSPs** to help them interpret and implement national laws on accessibility and disability inclusion in the financial services context.

Info box: Examples of Disability-Inclusive Financial Regulation

- **Ghana:** In 2025, the Bank of Ghana issued the **Financial Inclusion for Persons with Disabilities (FIPD) Directive**, mandating financial institutions to provide equitable, accessible, and non-discriminatory services for persons with disabilities. The Directive requires the adoption of disability-inclusive policies, staff training, accessible digital platforms, and physically accessible service points, with enforcement measures and penalties for non-compliance to ensure effective implementation.
- **Egypt:** the Central Bank of Egypt (CBE) has made the financial inclusion of persons with disabilities a strategic priority under the **National Financial Inclusion Strategy (2022)** and **Egypt Vision 2030**. The CBE's framework addresses accessibility across physical infrastructure, digital channels, products, and customer service, supported by structured monitoring and reporting mechanisms. For example, banks are mandated to establish "digital corners" within branches, equipped with communication tools that provide direct access to customer service staff trained in sign language. Egypt has also introduced bank cards with embossed numbers to improve usability for clients with visual impairments.
- **Pakistan:** The State Bank of Pakistan's Policy on the Financial Inclusion of Persons with Disabilities (2021) introduced comprehensive measures to improve the accessibility of banking services, and promote employment of persons with disabilities in the financial sector. It requires banks to install ramps at branches and ATMs, make key documents available in braille, provide sign language interpretation, and ensure accessibility of online / mobile services. It also specifies quotas for employment of persons with disabilities, with a minimum of 25% of these to be filled by women with disabilities.

Source: Alliance for Financial Inclusion (2023), '[Financial Inclusion for Persons with Disabilities](#)'.

CHAPTER 4: DISABILITY INCLUSION PRACTICES FOR FSPs

This chapter gives practical guidance for FSPs to apply the core principles of disability inclusion across all areas of their operations, aligned to their social mission and business strategy. It provides a toolkit for each of the **seven building blocks of disability inclusion for FSPs**, with an overview of disability inclusion practices, key actions for implementation, and links to more detailed resources, case studies and examples.

4.1 Strategy and Culture

4.1.1 Strategy and goals

Equitable inclusion of persons with disabilities, as well as other excluded groups, is an integral part of social performance, supporting a more just and inclusive society.

Persons with disabilities are represented in **every population demographic and sub-group**, and are often amongst the most marginalized members within these groups. Disability inclusion is therefore a **cross-cutting priority within social strategy**, even for FSPs that do not specifically identify persons with disabilities as a target client segment. The disability inclusion goals that you adopt may reflect different levels of focus, consistent with your overall strategy:

1. All FSPs should aim to fulfill **non-discrimination, fair treatment** and **“do-no-harm”** principles, and **comply with legal requirements** where applicable, by:
 - **Preventing exclusion or discrimination** against persons with disabilities, both as clients and as employees;
 - Ensuring **fair and respectful treatment** of clients and employees with disabilities;
 - Mitigating **risks associated with use of their products and services** by persons with disabilities;
2. To align with human rights and social inclusion principles, you should aim to provide **equal access and opportunities** for persons with disabilities as clients and employees, by:
 - Ensuring persons with disabilities can **access and use your products and services** on an equal basis with others;
 - Creating an **accessible and inclusive workplace**, and providing **reasonable accommodations** to enable persons with disabilities to participate on an equal basis.
3. If disability inclusion is a core element of your strategy, you may adopt disability inclusion goals that go beyond non-discrimination and equal access, by:
 - Providing products and services that **deliver specific outcomes for persons with disabilities** by addressing their needs and vulnerabilities, such as:
 - Empowering persons with disabilities and their caregivers to **overcome barriers to economic participation**;

- Enhancing their **financial autonomy, capabilities and wellbeing**;
- **Reducing their vulnerability** to health shocks or adverse climate-related impacts.
- **Actively promoting recruitment and employment** of persons with disabilities.
- **Mainstreaming disability inclusion** throughout your organizational culture.

After establishing your disability inclusion goals, define **measurable indicators and targets**, and track progress towards these. As a start point, **collect data** on disability status (see **section 4.2.3**) to track the **number and proportion of active clients with disabilities**, and the **number and proportion of employees with disabilities**, as high-level indicators of inclusion.

Use **disability-disaggregated data analysis** to track the same **outcome indicators** for clients with disabilities as for other clients within your target segments, aiming to ensure they achieve the same benefits from using your products and services. In addition, establish indicators for any specific outcomes you aim to achieve for clients with disabilities.

Action points:

- **Discuss at board and leadership level** how inclusion of persons with disabilities contributes to your overall mission.
- **Agree and commit to organizational goals for disability inclusion**, and communicate these externally, e.g. on your website and in annual reports.
- **Formulate strategies** to achieve these goals, and establish appropriate **indicators and targets** to measure and monitor progress and outcomes.
- Integrate these within **existing social performance management and reporting frameworks**.
- **Include performance on disability inclusion goals in annual reports**, including the number and proportion of active clients and employees with disabilities, and actions taken to eliminate discrimination, improve accessibility and remove access barriers.

4.1.2 Leadership commitment

The commitment of top leadership is essential to build a culture where disability inclusion is embedded as an integral component of your operations. Adopting and publicizing disability inclusion goals makes a strong statement of intent, but this may remain merely tokenistic unless the interests and perspectives of persons with disabilities are **recognized and prioritized at board level**.

The board should ensure the FSP's disability goals are reflected in strategic plans and monitor progress towards these, use relevant **disability-related data** as an input to strategic decision-making, and **allocate adequate resources** to strengthen organizational capacities for disability inclusion.

All board members should receive training on disability rights and the core principles of disability inclusion, and how these relate to their role in delivering the FSP's social mission. The board members should also seek to build their **experience of disability inclusion** through working directly with persons with disabilities and **partnering with organizations of persons with disabilities (OPDs)**.

Following the principle of “Nothing about us, without us” requires **representation by persons with disabilities** in decision-making roles. Building partnerships with OPDs helps the board to understand the perspectives of persons with disabilities as an **input to strategic decision-making**, although it does not constitute representation. In the longer-term, you can introduce proactive measures to promote representation of persons with disabilities within the board membership, to reflect the diversity of the communities you serve. This is particularly important for financial institutions with a strategic focus on disability inclusion.

Action points:

- Provide relevant **disability inclusion training** for all board members, including on the UNCRPD and relevant international, regional and national frameworks.
- Appoint a **‘disability champion’** at board or leadership team level to actively promote the FSP’s commitment to disability inclusion, both internally and externally.
- Build **partnerships with OPDs** to include perspectives of persons with disabilities in board decision-making.
- Set **key performance indicators (KPIs)** for the leadership team linked to the achievement of disability inclusion goals.
- Include relevant **information related to disability inclusion in board reporting**, including:
 - number of active clients with disabilities, and disaggregated client satisfaction and outcome data;
 - number of employees with disabilities, and data on turnover, pay and employee satisfaction by disability status, gender and seniority;
 - progress against disability inclusion goals and objectives.
- **Allocate financial and human resources** to build organizational capacities for disability inclusion, such as investments in accessibility improvements and staff training.
- In the longer-term, take steps to **increase experience of disability inclusion and representation of persons with disabilities** within the board by:
 - seeking candidates for board positions who have professional experience in disability inclusion and / or lived experience of disability;
 - ensuring inclusive recruitment processes for board positions (see **section 4.6.1**).

4.1.3 Staff engagement, awareness, and training

Successful implementation of disability inclusion strategies depends on the **commitment of all staff** and their **capacity to understand and apply** inclusive policies, systems and processes in practice.

Attitudinal barriers are amongst the greatest challenges to inclusion of persons with disabilities. As in society at large, FSP staff may hold misconceptions about the capabilities of persons with disabilities, including assumptions about their ability to work, manage their finances independently, or repay credit. These perceptions can directly influence decision-making and interactions, with negative impacts for clients and colleagues with disabilities.

Building staff awareness and engagement in disability inclusion is essential to **transition from negative attitudes to inclusive behaviors**. Training plays a critical role in building **understanding about disability as a human rights and social issue**, as well as equipping staff with **practical and technical skills** needed to apply inclusive practices in their day-to-day work.

A **comprehensive approach** combines disability awareness and inclusion training for all staff with function- and role-specific technical training, to ensure that responsibilities are matched with appropriate knowledge and skills.

1. **Disability awareness and inclusion training (all staff):** Basic disability awareness and inclusion training should be designed to support a culture of non-discrimination, respect, and accountability amongst all employees, regardless of function or seniority. The objective is to:
 - Build a shared understanding of disability as a human rights and inclusion issue
 - Address stereotypes, stigma, and unconscious bias.
 - Promote respectful attitudes, disability etiquette, and inclusive behaviors.
 - Clarify institutional commitments, policies, and expectations related to disability inclusion.
2. **Role-specific and technical training:** In addition, targeted training is required for staff whose roles directly influence accessibility, service delivery, employment policy and line management, covering key topic areas as shown below:
 - **Human Resources (HR) staff:** reasonable accommodation, unconscious bias, inclusive recruitment, job adaptation, return-to-work processes (including for persons who have acquired disabilities during their employment), inclusive performance management, prevention of exploitation, abuse and harassment (**section 4.6**).
 - **Frontline and customer-facing staff:** disability etiquette, communicating with and assisting clients with different types of impairments (**section 2.3.5**), providing and communicating information in accessible formats, applying, and responding appropriately to requests for support or accommodations, client protection and safeguarding considerations (**section 4.5**).
 - **IT, digital, and design teams:** digital accessibility standards, including the Web Content Accessibility Guidelines (WCAG), accessible authentication methods, and Universal Design principles applied to user experience design (**section 4.3.2**).

- **Facilities and administrative staff:** physical accessibility of premises, including accessible infrastructure, layouts, signage, emergency procedures, maintenance of accessible infrastructure, and accessibility audits (**section 4.3.1**).
- **Staff involved in data and reporting:** disability data collection, including ethical considerations, voluntary disclosure of disability status, confidentiality, and the use of disability-disaggregated data for analysis, monitoring and learning (**section 4.2.3**).
- **Staff involved in workplace health and safety (WHS) and emergency planning:** disability-inclusive risk assessment and mitigation, and accessible emergency and evacuation procedures (**section 4.6.3**).
- **Line managers:** inclusive recruitment, unconscious bias, reasonable accommodation, and inclusive performance management (**section 4.6**).

Action Points:

- After piloting, integrate **basic disability inclusion and awareness training** into mandatory onboarding and refresher training for all employees.
- Over the longer-term, use **structured implementation approaches** to embed staff training and capacity-building, by:
 - Adopting clear **internal policies and guidelines** defining training requirements and responsibilities.
 - Developing **structured training plans** linked to job roles, induction processes, and continuous professional development.
 - **Combining training formats**, including training of trainers (ToT) to build internal capacity, e-learning modules to reach staff across branches and locations, and in-person workshops whenever possible focused on practical application.
- **Leverage external training resources** (see examples in the resources list below), and **liaise with OPDs, disability support organizations and disability inclusion experts** to integrate lived experience and technical expertise into training design and delivery.
- **Use interactive and practical training methods** including case studies, role plays, simulations and real-life examples to help staff apply inclusive practices in their day-to-day work.
- **Reinforcing training** with peer learning, coaching and mentoring to support staff with practical application.
- **Assess effectiveness of training** through staff feedback, post-training assessments and observation of workplace practices.

Resources:

- **Humanity & Inclusion (2020), '[Factsheet: Stereotypes, cognitive biases and discrimination](#)'**: Provides explanations of cognitive biases and discrimination, with examples.
- **Asian Development Bank (2025), '[A Guide to Disability Inclusion Training and Development](#)'**: Provides general guidance on staff training within banking organizations with different levels of disability inclusion experience, including accessibility training, role-specific training content, and targeted training for leadership and client-facing staff.
- **Opportunity International (2025), '[Inclusive Finance Accessible Training & Meeting Cheat Sheet: In-Person / Virtual Meeting or Training for Inclusive Finance](#)'**: Provides guidance on how to prepare, hold and close inclusive meetings.
- **ENTELIS (European Network for Technology Enhanced Learning in an Inclusive Society)**: Link to training material and manuals for trainers on disability rights and digital accessibility
- **Light For The World, '[A guide for supporting training capacity for disability inclusion](#)'**: Manual to support disability inclusion training, with a focus on development organizations. Section 6 includes content for introductory disability inclusion awareness.
- **Alison, [Course: 'Disability Inclusion in the Workplace'](#)**: Free online course on strategies and practices to establish an inclusive workplace.

4.2 Management frameworks

The leadership team should design and implement disability inclusion strategies, and integrate these within the FSPs management policies, frameworks, and systems, to ensure sustained and consistent implementation of good practices.

4.2.1 Planning and performance management systems

To ensure focus and accountability, your disability inclusion goals should be operationalized within your **overall operating plan**, with **clear accountabilities** and **adequate resources** for delivery, rather than being treated as a separate initiative or project.

Include SMART (Specific, Measurable, Attainable, Relevant, and Time-bound) **disability inclusion objectives and targets** in your operating plan by functional area, and put in place **mechanisms for monitoring and reporting progress** against these. Examples of potential **output indicators** for functional areas include the number of staff trained in disability inclusion, the number of accessibility audits completed, the number of branches that comply with accessibility standards, etc.

Disability inclusion objectives should be **incorporated in performance management targets** for the CEO, leadership team and management, and be assessed along with other performance criteria in formal **performance evaluations**, including those used for bonus or incentive schemes. Performance evaluations may also include assessment of inclusive behaviors.

Action points:

- Create **disability inclusion action plans** aligned to your organizational disability inclusion goals and outcome targets:
 - **Assess current practices and capabilities** to identify gaps in relation to disability inclusion, and prioritize key areas for action.
 - **Establish objectives** for disability inclusion at organizational level in the medium- and short-term.
- **Assign responsibility** to functional heads to create **detailed action plans** to achieve these objectives, and identify resource requirements (human resources and funding).
- As part of the annual planning cycle, establish SMART objectives, indicators and targets for disability inclusion and incorporate these within the **operating plans** by functional area.
- Include resources for implementation in **functional budgets and staffing plans**.
- Integrate disability inclusion objectives and targets within **existing performance management frameworks**, including **performance evaluation systems** for the leadership team, functional heads, operational managers and branch managers.
- Establish processes for **data collection and reporting** to track progress against targets for disability inclusion (see **section 4.2.3**).

Case study:

- **Fundación Paraguaya** has progressively integrated disability inclusion throughout its operations over more than a decade. Targets for loan disbursement to persons with disabilities and other specific segments are set at branch level. These are tracked through its organization-wide One Page Project Management (OPPM) system, and included in bonus plans for every manager, including the executive team and CEO. (Source: **Barrier-Free Finance initiative (2025)**, [‘From pilot to mainstream: Fundación Paraguaya’s journey to serve people with disabilities \(PWD\) \(2012– 2025\)’](#))

4.2.2 Policies and procedures

As an essential good practice, FSPs should establish a **non-discrimination policy** that applies to the board, leadership, and all staff, contractors, and agents, and covers all organizational activities. This may be implemented either as a stand-alone policy or as part of a wider **diversity, equity, and inclusion (DEI)** or **gender equality, disability and social inclusion (GEDSI)** policy.

The non-discrimination policy should prohibit:

- all forms of discrimination on the basis of all **protected categories**, including both **direct and indirect discrimination** (see **section 2.3.7**), and
- discrimination against persons with disabilities by **denial of reasonable accommodations**.

In addition, you should **remove any policies** that restrict the right of persons with disabilities to access your products and services on an equal basis with others, for instance:

- **eligibility criteria with explicit exclusions** based on types of impairments or medical conditions.
- **requirements for persons with disabilities to appoint a third party** as joint account-holder, or to make decisions or transactions on their behalf.

While such policies are often framed as client protection measures, they discriminate against persons with disabilities by denying their **legal capacity and their right to control their own financial affairs**, as articulated in the UNCRPD (see **section 3.2.2**).

As you progressively implement disability inclusion strategies, establish **policies, procedures, protocols and standards** for accessibility and inclusion related to specific operational areas (such as staff training, premises management, procurement, IT systems development, data collection, product development, client protection, risk management, etc.), as outlined in the relevant sections of this chapter.

Action points:

- Establish a non-discrimination policy, or update your existing policy, to explicitly **prohibit discrimination** against persons with disabilities, including by **denial or reasonable accommodations**.
- Consult with **OPDs and / or disability support organizations** and seek feedback from **clients and employees with disabilities** to identify policy barriers.
- Identify **key policies** concerning relations with clients and employees, for example:
 - Code of Conduct
 - HR policy and procedures
 - Client protection policy
 - Client servicing policies and procedures
 - Credit policy (including eligibility and credit assessment criteria)
 - Communication (ICT) policy
 - Data collection policies
- Carry out a **review of these policies** and:
 - ensure they are aligned to the non-discrimination policy.
 - remove any provisions that directly exclude or discriminate against persons with different types of impairments.
 - amend any provisions that disproportionately disadvantage persons with different types of impairments.
 - include clear procedures for providing reasonable accommodation.
- Progressively **update policy and procedure frameworks** to operationalize accessibility standards and disability inclusion practices.

Resources:

- Humanity & Inclusion (2020), '[Factsheet: Disability Policy](#)': Tips and guidance for creating organizational disability policy framework.
- **Workable**, '[Anti-discrimination policy](#)', A simple template and guidance notes as a start point for companies to develop a non-discrimination policy.
- **ILO (2016)**, '[Promoting Diversity and Inclusion through Workplace Adjustments: a Practical Guide](#)': Includes an example policy on reasonable accommodation in the workplace, as well as practical guidance for providing accommodations.

4.2.3 Data and MIS

Collecting and analyzing disability-disaggregated data for both **clients and employees** are cornerstones for a successful disability inclusion strategy. Without accurate data, you will be unable to identify persons with disabilities you serve and collaborate with, understand their needs, recognize exclusion, design effective interventions, or monitor inclusion outcomes. As legal, regulatory and ESG frameworks evolve, collection and reporting of disability data will increasingly be required for compliance purposes.

A disability-inclusive approach requires the **collection, analysis, reporting, and monitoring** of information on the disability status of both **clients and employees**, embedded within existing Management Information Systems (MIS).

Client data:

- Collecting and integrating **disability-disaggregated data within your MIS** and/or **Client Relationship Management (CRM)** systems enables you to analyze the proportion of persons with disabilities within your client base, and understand their behaviors and usage of products and services, to inform disability inclusion strategies and monitor their impact.
- Collecting data on disability status when carrying out **market research and client surveys** helps you to identify specific needs and barriers faced by clients with disabilities, and identify ways to serve them better.
- Understanding the number of persons with disabilities in your client base and in the communities you serve provides an **evidence base for investment** in measures for accessibility and inclusion, both internally and in proposals to external funders.

Employee data:

- Collecting and analyzing **employee data disaggregated by disability status** enables you to analyze the proportion of employees with disabilities in your workforce by role-level, and key metrics such as employee satisfaction, turnover, and remuneration for employees with disabilities.
- This provides valuable information to identify and address **potential areas of inequality** in HR policies and practices, and take steps to address these.

The method chosen to **collect disability-related data** will impact both the accuracy and quality of the data collected, and the granularity of analysis that can be carried out. For instance, using a simple identification question (e.g. Do you identify as having a disability? with a Yes/No answer) enables analysis by **disability status (with/without disabilities)**. However, this does not capture the diverse nature of disability, and may lead to under-recording, as some persons with functional impairments do not identify

as a person with disabilities. To identify barriers that impact specific groups, it is recommended to **collect and disaggregate data by types of impairment**. It is also important to analyze how disability intersects with other characteristics, including gender and age, through **multi-dimensional disaggregation**.

A number of potential data collection methods are outlined below. The **Washington Group Short Set (WGSS)** is recommended as an internationally-accepted standard, which provides granular information by type of severity of functional limitations. However, alternative data collection methods that use **simplified approaches**, such as the examples listed below, may be considered more appropriate depending on your needs and objectives, and the cultural context.

Whichever method is used, the following principles should be applied when collecting disability data:

- Collect data only where it has a **clear purpose** to support inclusion;
- **Voluntary disclosure**: people should not be required to respond;
- Explain how and why the data will be used and ensure **informed consent**;
- Ensure **confidentiality and data protection**.

Info box: Tools and methods for collecting disability-related data:

1 The Washington Group Short Set (WGSS)

The Washington Group Short Set of Questions on Disability (WGSS) is a globally recognized tool designed to identify persons with disabilities in a way that is comparable across different cultural and economic contexts. The WGSS was originally designed to be used in national population censuses, and is widely used by governments for this purpose.

It assess difficulties across **six functional domains**, through a survey of six questions asking whether respondents experience **difficulty in carrying out activities**:

Seeing / Hearing / Walking or climbing stairs / Remembering or concentrating / Self-care / Communicating

For each question, it captures the **degree of difficulty** people experience in these daily activities through four response options:

no difficulty / some difficulty / a lot of difficulty / cannot do at all

Using the WGSS has a number of advantages:

- It **avoids asking about disability or impairment**, which can reduce stigma associated with these terms, and lead to increased disclosure.
- By asking about **difficulties people experience in everyday life**, staff can explain that the FSP wants to understand its clients and the issues they face, to find ways to serve them better.
- The questions are **precise and easily understood**, leading to more consistent responses.
- Data can be analyzed **by disability status** and by **type and / or severity of impairment**, providing detailed insights.
- It also facilitates **comparisons and benchmarking**.

However, it also has some **potential operational drawbacks**. Staff must be trained to administer it correctly, it requires time to ask all six questions, and the MIS needs to be able to capture data on both functional domain and severity. In addition, some questions (e.g. self-care) may be seen as sensitive in some contexts.

Some FSPs have implemented **simplified versions of the WGSS tool** to adapt to their cultural and operating context; for instance by collecting Yes / No responses for the six questions instead of the four responses on degree of difficulty, and / or by removing the question relating to self-care.

2 Self-identification:

Ask a self-identification question: **“Do you consider yourself a person with a disability?”** with response options (allowing multiple response):

No / Yes: physical / Yes: visual / Yes: Hearing / Yes: communication / Yes: remembering / concentrating / Yes: other / Prefer not to answer.

This method collects data disaggregated by types of impairment and respects voluntary disclosure considerations. It may also require less training and time to administer than the WGSS. However, the quality of data may be lower than for the WGSS, due to lack of precision in the questions, cultural interpretations, and potential stigma and fear of exclusion related to the term ‘disability’. These factors may lead to under-disclosure, and needs not being recognized.

3 Functional disability screen:

A simplified approach for basic segmentation through questions that focus on accommodation and support needs, and can be easily administered. This method is less suited for collecting data as part of a client MIS system, as it is not as precise as the WGSS and does not allow comparison to national-level data.

Example:

- i. “Do you experience any long-term difficulties that affect how you carry out daily activities?”
 - No / Some difficulty / A lot of difficulty / Cannot do at all
- ii. “Do you need any specific accommodations or support to access our services / to work?”
 - Yes / No
- iii. (Optional) “If yes, please specify the type of support needed.”
 - Mobility / Vision / Hearing / Communication / Cognitive / Other

4 Accessibility needs question:

A simple question about accommodation needs is often easier and quicker for staff and clients. While directly linked to operational considerations and support needs, it limits information and analysis by not capturing disability status. It is also likely to require free-text responses to fully capture accommodations required, and does not facilitate analysis or comparisons. It is therefore not recommended as for collecting data to populate MIS systems, but may be useful when registering participants for events, trainings or focus group discussions.

Example:

“Do you require any specific accommodations to interact with us comfortably (e.g., sign language, large print, step-free access, longer appointment time, etc.)?” No / Yes (please specify)

Action points:

- **Review current data collection systems** including protocols, MIS systems, and reports to assess what disability-related data is currently collected (if any), and how it is used, and identify gaps.
- **Select a data collection method** appropriate to your operating context and disability inclusion goals.
 - It is recommended to use the **WGSS questions**, or one of the other methods listed that captures **data on types of impairments**.
 - **Review the questions with OPDs** to ensure the questions are understandable and appropriate; adjust the wording if necessary.
 - **Carry out a pilot** of the data collection method to identify any further adjustments to wording or staff training before roll-out.
- **Modify existing data collection tools** (e.g. product application forms, satisfaction surveys etc.) to incorporate the disability data collection method and **integrate disability data** into data collection, MIS and reports.
- **Develop protocols** for collecting disability data from clients and employees, in consultation with OPDS and employee representatives.
- **Train staff responsible for data collection** on inclusive data collection protocols, methodologies and tools, accessible information formats, and ethical data collection principles.
- Use **multidimensional disaggregated data analysis** to identify and remove barriers to access and usage, improve products and servicing, and refine outreach strategies.

Examples:

- **KOMIDA in Indonesia** and **Opportunity Bank of Uganda (OBUL)** are leaders in gender- and disability-inclusive finance, serving 15,000 and 30,000 clients with disabilities respectively. They collect and use disability data to drive their disability inclusion strategies, with OBUL adopting the WGSS questions, and KOMIDA using a simplified version of the WGSS. They use disaggregated-data analysis to improve outreach and increase their client base, drive continuous improvements in servicing, and monitor progress towards their goals. This data has helped them to demonstrate the impact of their inclusion strategies, build the case for scaling-up, and attract new funding sources from impact investors. **Source: Opportunity International (2025), [‘Using the Washington Group Short Set \(WGSS\) in Inclusive Finance: Cheat Sheet’](#)**

Resources:

- **Opportunity International (2025), [‘Using the Washington Group Short Set \(WGSS\) in Inclusive Finance: Cheat Sheet’](#)**: Provides practical guidance and steps for FSPs to implement and use the WGSS to support disability inclusion strategies.
- **Opportunity International (2025), [‘Inclusive Finance Cheat Sheet: Applying Intersectional Data & Analysis’](#)**: This factsheet provides guidelines for using intersectional data in inclusive finance providing key actionable steps and examples.
- **Washington Group on Disability Statistics, [‘WG Short Set on Functioning \(WG-SS\)’](#)**: Introduction to the WGSS questions and link for downloading the questionnaire.
- **UNFPA, [‘A brief explainer on The Washington Group Questions on Disability’](#)**: Factsheet on the WGSS.

4.3 Accessibility

Accessibility is at the core of disability inclusion, enabling persons with disabilities to access environments, **information and services** on an equal basis with others. This section explores how FSPs can make their **physical infrastructure, digital channels, and information** accessible to persons with disabilities, while also enhancing usability for a broad range of user groups.

The resource below provides guidance on accessibility across all three of these areas. Further resources are included in each of the three sections in this chapter.

- **World Blind Union and CBM Global Disability Inclusion, K. Al Jubeh, B. Dard, Y. Zayed (2020), [‘Accessibility GO! A Guide to Action, delivering on 7 accessibility commitments’](#)**: practical guidance for a whole-of-organisation approach towards accessibility and inclusion, covering built environments, information, communications and IT systems, as well as employment and HR management.

4.3.1 Physical accessibility

To maximize inclusion, all locations used by your clients and employees should be **physically accessible** for persons with disabilities, and others such as older persons and pregnant women. Physical locations for service delivery and client interactions include branches, ATMs, and offices run by agents or partners. Employee workplaces include branches, regional offices and head office buildings.

Physical accessibility means designing buildings and facilities so that persons with disabilities can easily approach, enter, and move around the building, and use specific functions within it to achieve their intended purpose. This has particular considerations for persons with impaired mobility, wheelchair users, and persons with sensory impairments.

Many countries have implemented **technical standards** for physical accessibility of buildings open to the public, which may be enforced by laws or regulations. In addition, the International Standards Organization (ISO) has issued the technical accessibility standards '[ISO 21542: Building Construction – Accessibility and Useability of the Built Environment](#)'. Some countries also have specific physical accessibility standards related to the financial services sector (e.g. for accessibility of ATMs).

These standards can be used to compile **accessibility checklists** specifying detailed physical accessibility requirements, in order to create specifications for new premises, and carry out **accessibility audits or assessments** of existing locations (see information box below).

Info box: Physical accessibility audits and assessments

Physical accessibility audits are carried out to **identify barriers** that persons with disabilities may face when accessing workplaces, branch offices, service areas, or ATMs, and **identify practical improvements** to make these more accessible to users. **Technical accessibility audits** assess compliance with formal accessibility standards and may require specialist expertise. Simplified **accessibility assessments** can be conducted by trained FSP staff using practical checklists to evaluate how accessible the building is in everyday use.

These assessments involve a **structured walkthrough** of the premises to document barriers and propose improvements. They are most effective when conducted as a **participatory exercise** involving branch staff, facilities managers, and persons with disabilities, whose lived experience helps identify barriers that may otherwise be overlooked. **Partnering with an OPD or disability organization** can help train staff and support initial assessments.

Areas typically reviewed during an assessment include:

- Approach to the building (parking, walkways, and external access routes, etc.)
- Entrances and exits
- Internal navigation (corridors, doors, stairs, lifts, etc.)
- Accessible toilets and washrooms
- Signage (directional signage, including for emergency exits and toilets)
- Client servicing facilities (counter height, queueing systems, hearing induction loops, etc.)
- ATM booths and ATM units.

Detailed **technical accessibility standards** and **simplified accessibility checklists** can be found in the resources listed in this section.

While accessibility standards for new premises can be incorporated straight away, often with little or no cost, implementing physical accessibility improvements across existing branches and offices requires a **long-term approach**. However, making even small improvements in accessibility can have significant benefits for persons with disabilities. It is recommended to start by **prioritizing simple, low-cost solutions and “quick wins”**, as noted in the action points below.

Action points:

- Find out about applicable **national accessibility laws and regulations**, or international standards where there are no national standards (see resources below).
 - Contact OPDs, disability support organizations, accessibility services providers, financial industry associations and regulators to find information about standards.
- **Provide training** on accessibility and inclusion to staff in functions responsible for premises management and maintenance, including ATM installations.
- Establish **a list of criteria for physical accessibility** of buildings and ATMs, using national or international standards where applicable, and / or the resources in this section.
- Incorporate these accessibility criteria in **protocols for the design and layout of new premises**, including ATM installations, and integrate these within criteria for **procurement processes and rental of premises**.
- Create a plan to carry out **accessibility audits or assessments of existing locations**, including office buildings, branches and ATM installations.
 - Use the accessibility criteria you have developed to create an accessibility audit / assessment form
 - Select a number of locations for initial audits / assessments.
 - Seek support from OPDs and / or specialist disability support organizations to carry out initial audits / assessments and provide guidance to FSP staff on the process.
 - Implement audits / assessments at other locations over time, with participation of OPDs and persons with disabilities.
- **Identify accessibility gaps** by location and areas (such as entrances, counters, toilets, signage etc.), and **create plans** to address these:
 - Start by implementing **“quick wins”** that can be resolved quickly and cheaply.
 - Prioritize other required modifications and **create a plan and timeline** to implement these progressively. Potential approaches include:
 - Focusing initially on **modifying a few branches or offices as a pilot**, and to create models of good practice.
 - Planning modifications linked to **schedules for branch refits or lease renewals**.
- **Track progress against plans** using indicators and targets, such as the number of accessibility audits / assessments, and adaptations implemented.
- Communicate accessibility criteria to **agents and third-party service partners**, and support them to create plans for audits / assessments and adaptations.

- As you implement accessibility improvements, **inform clients** where they can find accessible locations, e.g.
 - Communicate accessibility features of branches, ATMs and agent offices to OPDs.
 - Incorporate accessibility updates within client communications.
 - List key accessibility features in branch and ATM directories on your website.
- **Gather feedback** on an ongoing basis to monitor the impact of modifications, and identify further improvements needed:
 - From OPDs and clients with disabilities about accessibility barriers in branches.
 - From employees related to branch and office accessibility.

Resources:

- **Asian Development Bank (2025), ‘[Accessibility Audit Toolkit for Existing Bank Branches and Offices](#)’**: Physical accessibility guide and audit tool for bank branches and head offices based on ISO 21542.
- **Light for the World (2017), ‘[Resource book on disability inclusion](#)’**: The section “How to conduct an Accessibility Audit” (p47-50) provides an example of a non-technical accessibility assessment form.
- **Humanity & Inclusion (2020), ‘[Factsheet: Accessibility in the company](#)’**: Simple introduction to accessibility for employers, including practical guidance and examples of criteria for carrying out a workplace accessibility assessment.
- **Opportunity International (2025), ‘[FSP Accessibility Assessment Form](#)’**: Simple, non-technical tool for high-level accessibility assessments of FSP branches.
- **UNICEF (2022), ‘[Toolkit on Accessibility: Accessibility Assessments](#)’**, comprehensive guidance for carrying out physical assessments of buildings
- **UNICEF (2022), ‘[Toolkit on Accessibility: Accessibility Checklists](#)’**: Detailed checklists for physical accessibility assessments, to accompany the guide above.

4.3.2 Digital accessibility

Providing **digital financial services** through **websites, internet banking, digital onboarding processes, and mobile apps** is often the most effective way to improve access for all users, including persons with disabilities. Digital technologies offer **cost-effective and scalable solutions** to overcome barriers caused by the location of services and inaccessible physical infrastructure, as well as flexibility to provide information and communications in multiple and user-controlled formats.

However, digital channels and interfaces can also **create new barriers**, in particular for persons with sensory or intellectual impairments, unless they are designed for accessibility. Some common barriers encountered by persons with disabilities include:

- Inaccessible on-screen content (e.g. small fonts, low color contrast, complex language etc.).
- Downloadable documents not provided in accessible or alternative formats.

- Prompts and verification messages not provided in audible formats.
- Small or poorly labelled tick-boxes or buttons.
- Complex screen layouts and navigation.
- Complex or time-limited authentication processes.
- Distracting content (e.g. animations or pop-ups) which cannot be turned off by the user.
- Inaccessible CAPTCHAs with no alternative options.
- Navigation by mouse or touch-screen only, with no keyboard option.
- Internet and mobile banking apps are not compatible with screen readers.

Digital accessibility means designing and developing digital interfaces and content so that they work for all users. Digital accessibility is essential for persons with disabilities, but also facilitates access for other users, including older persons and persons with low literacy levels, and improves the user experience for everyone.

Some persons with disabilities use **assistive technologies** to access digital content. For instance, persons with visual impairments may use **screen readers** which convert written text into audio format, and persons with motor impairments may use devices such as **pointers** or **switches** to input data, or may use the **keyboard only** rather than a mouse or touch-screen. Digital accessibility requires ensuring that interfaces and content are compatible with assistive technologies to ensure accessibility for all of these users.

Info box: Web Content Accessibility Guidelines (WCAG)

The [Web Content Accessibility Guidelines \(WCAG\)](#) provide an internationally recognized standard for digital accessibility, developed by the World Wide Web Consortium (W3C). The current version is WCAG2.2.

It provides 13 guidelines organized around four key principles for accessible digital content:

- 1. Perceivable**- Information can be perceived by different users and presented in different ways; e.g. text alternatives for images, captions for audio, etc.
- 2. Operable** – Functionality works for all users and modes of interaction; e.g. keyboard-only navigation, speech input allowing sufficient time to complete tasks etc.
- 3. Understandable**- Information and functionality can be understood by all users; e.g. consistent navigation and labelling of controls, simple language, etc.
- 4. Robust**- Content works across different platforms and assistive devices e.g. compatibility with screen readers which read the visible information on a webpage in audio format.

Each guideline includes testable success criteria at three levels of conformance (A, AA and AAA).

Many governments and regulators have issued guidelines or regulations for digital accessibility referencing WCAG. These are usually based on conformance with **WCAG 2.1 or 2.2 at Level AA**.

It is usually much cheaper and easier to **build in digital accessibility from the start** when designing or upgrading digital channels and content, rather than applying fixes later. For existing digital channels, carry out an **accessibility audit or assessment** to identify and prioritize gaps, and create a plan to address these over time.

While carrying out a technical digital accessibility audit requires specialist expertise, there are also simple tools that can be used to identify and fix some of the more common accessibility issues (see resources list below). Many website hosting and development platforms also provide **built-in accessibility checkers**.

It is important to note that technical assessments cannot fully determine whether digital content is accessible to users in practice, or evaluate the overall user experience. When designing, developing, and updating digital channels, engage with OPDs to enable the **active participation of persons with disabilities** throughout the process, including **user-testing** with persons with different types of impairments in addition to technical assessments.

Action points:

- Find out about any applicable **national regulations or guidelines** for digital accessibility.
- Provide **job-specific training to key staff**:
 - on accessibility and WCAG standards for **IT staff** (developers, project managers).
 - on accessibility and inclusive communication for **content authors**.
- Appoint an '**accessibility champion**' in the IT team and support them to build knowledge of WCAG standards, keep up to date with developments, and train other team members.
- Incorporate WCAG standards into **policies and processes for designing, developing and updating digital channels**, and specify requirements to any outsourced developers.
- Carry out **accessibility audit or assessments** of existing digital channels, including testing and feedback by persons with different impairments, and identify gaps.
 - The resources list below includes a range of tools that can be used for accessibility assessments, including free resources for simple assessments by non-technical users.
- Engage with **OPDs and organizations with specialist expertise** to help prioritize actions to address gaps.
- Create a **time-scaled plan** and **allocate budget and resources** to implement accessibility improvements, prioritizing:
 - straightforward, low-cost fixes and “quick wins”;
 - changes with greatest impact for clients.
- **Track progress** on the extent of compliance with WCAG, and activity indicators such as the number of accessibility audits completed.
- Engage **persons with different impairments to carry out user-testing** of new or updated digital channels.
- **Provide information** on your website and digital channels on accessibility features and how to use them.

- **Provide accessible feedback channels** in websites and mobile apps, seek feedback from clients on the accessibility of your digital channels, and use this to drive continuous improvements.
- Consider creating an **accessibility statement** for the organization to demonstrate commitment to accessibility and disability inclusion (see resources section below).

Resources:

- W3C, '[Web Content Accessibility Guidelines \(WCAG\)](#)': Detailed information on WCAG principles, guidelines and success criteria; technical guidance for developers, non-technical guidance and training materials.
- W3C, '[Easy Checks — A First Review of Web Accessibility](#)': Simple checks that can be carried out by non-technical users
- W3C, '[Website Accessibility Conformance Evaluation Methodology \(WCAG-EM\)](#)': Provides a structured approach to help evaluate websites for accessibility.
- W3C, '[Tips for Getting Started](#)': Practical considerations for designing, writing, and developing accessible web content.
- W3C, '[Developing an Accessibility Statement](#)': A step by step process for creating an accessibility statement.
- W3C, '[Web Accessibility Evaluation Tools List](#)': Links to accessibility assessment tools from W3C and other suppliers (some free), and guidance for selecting evaluation tools.
- UserWay [Website Accessibility Tools](#) offers a free, simple website accessibility checker, and subscription options for accessibility assessment and fixes based on WCAG standards.
- W3C, '[Curricula on Web Accessibility](#)', free resources to help organizations create learning modules and courses on digital accessibility.
- EdX, '[W3Cx: Introduction to Web Accessibility](#)', self-paced training course with completion certificate, based on the W3C curricula, suitable for both technical and non-technical users.

4.3.3 Accessible information and communication formats

Persons with sensory or intellectual impairments or psychosocial disabilities may have difficulty in perceiving or understanding information in some formats, including visual (e.g. text and images) and / or auditory (e.g. speech, audible signals). Key information for clients and employees should therefore be presented in a **range of accessible and alternative formats** to ensure it is accessible to all users.

Printed materials (e.g. documents, contracts, handouts, leaflets, brochures and posters) and **electronic documents** (sent by email or embedded in websites). can be made more accessible for users with visual and intellectual impairments by following **accessibility guidelines** provided in the resources listed below, and using the **built-in accessibility checkers** in many software packages.

Key areas include:

- **Color:** Ensure a high contrast between text and background colors. Do not use color alone to convey information.
- **Fonts:** Use standard, sans-serif fonts of at least 11 points for body text, and use bold for emphasis rather than italic or underlining.
- **Alignment and spacing:** Use left-aligned rather than justified text, and adequate space between lines of text.
- **Content:** Use short sentences and simple language. Avoid jargon, and provide definitions for technical terms.
- **Screen reader compatibility:** Use built-in **header structures** (Header 1, header 2 etc.) and **numbered or bulleted lists** to show content structure. Add **alternative text (alt-text)**, to pictures, graphics, charts etc. to describe their content and function. Use meaningful text for **embedded links** (e.g. “visit the website” instead of “click here”).

In addition, offer key information in a **range of alternative formats** that are accessible for persons with different impairments, such as:

- **Large print:** versions of documents designed for persons with visual impairments using larger font sizes.
- **Plain language:** documents written so that they can be easily understood by the intended audience, using clear, simple language, avoiding unnecessary jargon and complex sentence structures.
- **Easy read:** an accessible format for documents, designed with and for persons with intellectual impairments. It uses only simple words and very short sentences, often combined with pictures or icons, and clear design formats.
- **Picture books:** may be used as an alternative to written instructions to show steps involved in transactions and processes, for instance for persons with intellectual impairments.
- **Braille:** a system of tactile written language used by persons with visual impairments, which uses patterns of raised dots to represent characters.
- **Sign languages:** natural languages that use signs and gestures for communication, which have evolved in different Deaf communities, and vary between countries and regions.
- **Audio formats:** audio recordings accompanied by written transcripts.
- **Video formats:** videos should include on-screen captions and sign language interpretation, with written transcripts provided, so that they are accessible for different users.

Action points:

- Develop **protocols for accessible print and electronic documents**, and provide **guidelines and checklists** to help staff to use these. Use the resources in this section as a start point.
- Contact OPDs to find out about the **communication needs and preferences of persons with disabilities** in target communities, to prioritize accessibility strategies:
 - For example, find out if persons with visual impairments commonly use braille / screen readers, or identify the form of sign language used by persons with hearing impairments.
- Provide key information for clients and employees in a **range of accessible formats**.
 - **Use plain language wherever possible** for documents provided to clients, and create plain language versions of complex documents such as product contracts.
 - Use **built in accessibility features** in document creation software applications such as Microsoft Word / PowerPoint, Adobe Acrobat and Canva.
 - Contact **OPDs and disability support organizations** to find **providers of services** such as sign-language interpretation, braille / Easy Read document production.
- Communicate protocols for accessible information formats **to agents and third-party client service providers**, and support them to implement these.

Resources:

- **EU Bridging the Gap, '[Inclusive and accessible communication guidelines](#)'**: Practical tips on communicating with persons with different types of impairments; instructions to make accessible documents, videos and other communication products and accessibility features of major platforms, plus holding inclusive meetings and events.
- **UN (2022), '[Disability-Inclusive Communications Guidelines](#)'**, Guidelines on inclusive language and creating inclusive content; guidance and checklists for creating accessible online content, videos, emails, documents and spreadsheets, and accessible meetings.
- **WebAIM, '[Contrast Checker](#)'**: free online tool to check test / background color contrast.
- **UK Association for Accessible Formats (UKAAF), '[A guide to producing Easy Read documents](#)'**: Guidelines for organizations to produce information and documents in Easy Read

4.4 Inclusive products and services

This section focuses on inclusion of clients with disabilities in product and service delivery. This includes developing products and services that are accessible and appropriate to their needs, providing flexible servicing options, conducting targeted outreach, and including persons with disabilities in client training and capability-building activities.

4.4.1 Inclusive design processes

The aim of inclusive design processes is to ensure that products, services, and channels are both **accessible and appropriate for all users**, including persons with disabilities. Use inclusive design approaches when developing new products, services, and delivery channels, and when making significant amendments or upgrades.

Key components of disability-inclusive design processes are:

- using **disability-disaggregated data** to inform the design process;
- implementing **inclusive research methodologies**;
- enabling **active participation of persons with disabilities** in all stages;
- applying Universal Design principles to ensure usability by a diverse range of users.

The first step in the inclusive design process is **collecting and analyzing data disaggregated by age, gender and disability** to understand the needs of different groups within the target population (see **section 4.2.3**). This includes analysis of **existing client data**, including product usage and behaviors, satisfaction surveys and exit interviews, and **carrying out qualitative and / or quantitative research**.

All **client research modalities** should be designed to be **inclusive of persons with disabilities** within the targeted communities. Collaborate with OPDs to ensure research methodologies (including outreach, sampling, data collection) are **accessible** and enable **fair representation and participation** of men and women with different types of impairments.

Participatory research methods, where FSP staff and community members collaborate together to define needs and co-design solutions, can be used to deepen engagement with persons with disabilities, and support a **strengths-based approach** recognizing their agency and capabilities.

Consultation with persons with disabilities is critical to identify and address barriers or risks that may not be apparent to design teams. Hold consultations **early in the design phase** to provide scope for users to contribute to decisions, with subsequent engagements to validate assumptions and refine prototypes. To ensure consultations are meaningful, rather than a tokenistic exercise, requires intentional planning to **create accessible, supportive environments** that enable persons with disabilities to contribute fully (see information box below).

Info box: Consultations with persons with disabilities

- **Recognize persons with disabilities as experts in disability inclusion:** Compensate OPDs and participants for their time and expertise. Let them know you want to understand their perspective, and value their opinions.
- **Seek diverse representation:** Partner with OPDs to co-design the consultation and support outreach to persons of different genders and age groups, with different types of impairments. Consider how you can include groups that are often underrepresented, such as persons who are deaf or deafblind, and those with cognitive or speech impairments, or psychosocial disabilities.
- **Address communication barriers:** provide support for individual participants e.g. provide sign language interpreters, enabling assistance from support persons.

- **Ensure accessibility:** select an accessible, easy-to-reach venue, and offer accommodations to all participants. Set aside a budget-line for accommodations when planning.
- **Brief participants:** Persons with disabilities may have little knowledge of financial services, and may be new consultation processes. Provide advance information about your FSP, and the subject matter for the consultation. Explain the purpose of the consultation, the process you will follow, and what input you need from participants.
- **Create a safe and supportive environment:** Explain that participation is voluntary, and information will be kept confidential. Hold small group discussions to encourage participation and open discussion. Consider holding separate sessions for particular groups who may share common experiences (e.g. by types of impairments, or women-only groups).
- **Use inclusive facilitation methods:** Keep sessions short with frequent breaks, and allow extra time for processing information and discussions. Use everyday language, and avoid jargon or technical terms. Ask simple, open-ended questions, for example: “What would help you feel safer managing your money?”
- **Follow up:** Share what was learned, and how this influenced decisions.

Use the resources listed below for more guidance on holding meaningful consultations with persons with disabilities.

Action points:

- Collaborate with OPDs at all stages when designing and conducting **market research, pilot studies, and client feedback and outcome surveys**, to ensure processes are accessible and inclusive, and enable the full participation of persons with disabilities.
- Develop **protocols for data collection from persons with disabilities** that address social and communication barriers.
- **Train researchers, interviewers and facilitators** (both FSP staff and external researchers) in inclusive research methodologies, data collection protocols (see section 4.2.3), and communication with persons with different types of impairments (see section 2.3.5)
- Ensure **sample populations** for research include both women and men with disabilities, and persons with different types of impairments.
- In surveys, include questions for **all respondents** on the **accessibility of products, services, and channels**, and whether they can be accessed and used independently and safely.
- **Collect data** on disability status of respondents on a voluntary and confidential basis. **Disaggregate and analyze responses** by disability status, gender and age, and by types of impairment wherever possible (see section 4.2.3).
- Design **inclusive consultation processes** to enable persons with disabilities to participate meaningfully.
- Create **guidelines and criteria for design and testing** based on Universal Design principles (see section 2.3.3).
- Include diverse groups of persons with disabilities in **pilot tests and user-testing**.
- Carry out **accessibility assessments** of all new or upgraded products, services, or delivery channels (see section 4.3), regardless of the results of pilot tests.

Resources:

- **Asian Development Bank (2025), ‘[Implementing Inclusive Design Principles in Banking Organizations](#)’:** Provides guidelines on participatory design processes, and case study examples of inclusive product and service offerings developed by FSPs.
- **CBM (2024), ‘[Guidelines for rights-based consultations with OPDs](#)’:** a step-by-step guide to meaningful engagement and consultations with OPDs and persons with disabilities using a rights-based approach.
- **Australian Banking Association (2023), ‘[Accessibility and Inclusion Principles for Banking Services](#)’:** Outlines principles to promote equitable access, usability, and inclusivity for clients with disabilities applied to banking services, with Section 4 covering Inclusive Design.
- **Mary Wickenden, ‘[Disability inclusive research: What is it and how can we do it?](#)’, Institute of Development Studies:** Guidelines on participatory research methods for disability-inclusive research.

Case study:

- **Advancing financial inclusion for women with disabilities in Indonesia through a strength-based, intersectional approach:** This partnership between **TERALA Foundation (an OPD), KOMIDA (an MFI), Opportunity International Australia, and MSC** used a strength-based approach that positioned women with disabilities as economic agents and co-designers of inclusive finance. An OPD-led, participatory process identified systemic barriers to accessing financial services, and highlighted the strengths and capabilities of women with disabilities, including repayment discipline, informal enterprise experience, peer support networks, and collective problem-solving skills. This approach informed practical inclusion measures by KOMIDA through data capture, staff training, accessibility improvements, and ongoing engagement with OPDs.

4.4.2 Inclusive products

Many FSPs have demonstrated that persons with disabilities can **use and benefit from mainstream financial products**. Their experiences show that the most effective strategy for inclusion of persons with disabilities is to **enable their access to existing products** through servicing adaptations and targeted outreach, rather than creating ‘special’ products or services for persons with disabilities.

This approach is consistent with the **principles of inclusion** outlined in the UNCRPD, whereas creating ‘special’ products or eligibility criteria for persons with disabilities can be seen as reinforcing their marginalization. In addition, tailored products for persons with disabilities are often less commercially viable, in particular if they include discounted fees or interest rates, which may not be sustainable.

Many barriers experienced by persons with disabilities can be removed through **small design adaptations to existing products**, such as simplified documentation, accessible information and communication formats, flexible repayment schedules, and inclusive digital design, benefiting both persons with disabilities and the wider client base (see table below).

Table 4 Inclusive products: examples of barriers and adaptations

Product category	Common barriers experienced by persons with disabilities	Examples of inclusive product adaptations
Transaction accounts	<ul style="list-style-type: none"> Inaccessible ATMs; Concerns about security and money management, in particular for persons with cognitive or psychosocial disabilities. 	<ul style="list-style-type: none"> Cashless systems (payment cards / mobile payments); User-specified transaction limits; Designated savings “pots”; Options for support from a nominated third-party individual to manage; Money management tools.
Savings accounts	<ul style="list-style-type: none"> Complex application forms; Rigid KYC processes; Minimum deposit requirements; Inaccessible branches & ATMs 	<ul style="list-style-type: none"> Assisted onboarding; Alternative ID acceptance; Low / no minimum deposit accounts; Accessible mobile apps; Agent networks / mobile banking units.
Digital financial services	<ul style="list-style-type: none"> Inaccessible interfaces and authorization processes; Complex interfaces; Frequent changes to products and interface, often with no warning; Concerns about fraud or scams. 	<ul style="list-style-type: none"> Inclusive design processes for new systems and future adaptations; Adherence to digital accessibility standards. Inclusive client trainings on digital skills and online security.
Loans	<ul style="list-style-type: none"> Staff bias; Complex application processes; Collateral, credit history and documentation requirements; Unaffordable interest rates and fees Inflexible repayment schedules; Lack of information / knowledge about credit. 	<ul style="list-style-type: none"> Flexible documentation requirements; Loan assessment based on income and repayment ratios; Application forms on accessible website; Reduce interest rates or waive fees for first cycle; Alternatives to collateral e.g. co-borrower arrangements, individual guarantors, or third-party guarantees. Inclusive financial literacy training
Insurance (health, life)	<ul style="list-style-type: none"> Exclusion clauses; Unaffordable premiums; Inaccessible policy documents; Complex claims processes 	<ul style="list-style-type: none"> Plain-language policies; Under-writing based on individual assessment; Flexible premium and cover schedules; Simplified and assisted claims processes.

Economic and affordability barriers relating to pricing or collateral requirements can significantly restrict persons with disabilities' access to financial products. While preferential terms may not be commercially viable in the long term, **targeted pricing strategies** can provide an effective entry point, for example reduced interest rates or fee waivers on their first loan, and low or zero minimum deposit saving accounts. These enable clients with disabilities to begin saving, invest in income-generating activities, and build their financial capacity. Over time they can transition to standard products, supporting **increased client acquisition** and **sustainable portfolio growth**.

Mechanisms that support **collateral-free lending** include **co-borrower or guarantor arrangements** with clients, and **third-party guarantee schemes** through partners such as NGOs or social investors. In some countries, **government-backed guarantees or incentives** support lending to vulnerable groups, including persons with disabilities.

To increase your outreach to persons with disabilities, there may be a case for creating adapted products to **address particular barriers or vulnerabilities** they face, such as products that facilitate supported decision-making, or reduce vulnerability to climate-change impacts.

Furthermore, with the number of persons with disabilities increasing as populations age, there is a growing market for **financial products targeted at persons with disabilities**, such as loans for assistive devices or accessible housing. Impact investors are showing increasing interest in providing capital to support products aimed at empowering persons with disabilities, which may enhance long-term sustainability.

Action points:

- Identify and implement **simple adaptations to existing products** that address access barriers, and pilot these alongside servicing adaptations and accessibility improvements.
- Use **inclusive design processes** to deepen your understanding of the needs of persons with disabilities in your target client segments, and incorporate these in product development (see **section 4.4.1**).
- FSPs with a focus on disability inclusion may develop **tailored or targeted products** to meet specific needs and vulnerabilities of persons with disabilities and address barriers to access.
- Ensure tailored or targeted products are **commercially sustainable**:
 - Provide products that support the client journey from entry-level onwards, to build long-term client value.
 - Develop products and features that serve broader client groups, as well as persons with disabilities.
 - Use guarantees or incentives provided by partners or governments, where available.

Case studies:

- **Fundación Paraguaya:** Recognition of persons with disabilities as commercially viable clients is at the core of Fundación Paraguaya’s approach to disability inclusion. It focuses on implementing accessibility adaptations, reasonable accommodations and targeted outreach to enable persons with disabilities to access its existing financial and non-financial services, rather than creating ‘special’ products with favorable credit terms. **(Source: Barrier-Free Finance Initiative (2025), ‘[From pilot to mainstream: Fundación Paraguaya’s journey to serve people with disabilities \(PWD\) \(2012– 2025\)](#)’)**
- **BRAC Myanmar** provides a micro-finance loan specifically designed for persons with disabilities, alongside life-skills and financial training and entrepreneurship support. This allows them to use a family-member ID if they don’t possess one and access collateral-free credit by appointing a co-borrower, and access a voucher facility to postpone one loan repayment if they face an emergency issue. These adaptations help to overcome barriers to access, and recognize increased vulnerability to financial shocks. **BRAC (2023), ‘[Designing holistic solutions for people with disabilities: Lessons from BRAC Myanmar](#)’ [blog]**
- **The Central Bank of Bangladesh (Bangladesh Bank)** has implemented comprehensive frameworks to increase access to financial services for persons with disabilities, including addressing affordability barriers. Measures include allowing persons with disabilities to open basic bank accounts with as little as 10 takas (about US\$ 0.1), and access collateral-free loans of up to US\$50 at a concessional interest rate, backed by a refinancing fund from Bangladesh Bank. **Alliance for Financial Inclusion (2023), ‘[Financial Inclusion for Persons with Disabilities](#)’**
- **The Pacific Insurance and Climate Adaptation Programme (PICAP)** strengthened gender- and disability-disaggregated data systems and used consultative design processes to develop inclusive climate risk insurance products that are accessible, affordable, and relevant for women and persons with disabilities, who face heightened risks from climate change impacts in Pacific Island nations. **(Source: Centre of Excellence of Gender-smart Solutions, ‘[Gender and Disability Inclusion in Climate Risk Insurance in the Pacific](#)’)**
- **SIBSTAR:** a UK debit card and mobile application developed and launched in partnership with Mastercard and Alzheimer’s Society in 2023. It is specifically designed for persons with dementia, to help them to manage their day-to-day spending independently and safely, with optional limits on cash withdrawals or daily / monthly spending, real time transaction notifications, and the ability to invite a support person to help them manage their account on an app. **(Source: Asian Development Bank (2025), ‘[Implementing Inclusive Design Principles in Banking Organizations](#)’).**
- **Northwest Access Fund:** A USA-based FSP dedicated to serving persons with disabilities, providing customized loans, financial coaching, and other resources to promote access to assistive technology, independence, financial resilience, and life opportunities.
- **Parabank:** A Brazilian fintech focusing on the financial inclusion of persons with disabilities and their family members. Parabank offers digital checking account and payments options accessible in multiple formats, and loans for assistive devices.

4.4.3 Inclusive service delivery

While accessibility focuses on environments and information formats, service delivery addresses **how you interact and communicate with clients** across all touch-points. Inclusive service delivery requires a **range of accessible channels** that bring products and services **close to clients**, and enable two-way communications in ways that are **flexible and responsive** to their needs, preferences and choices.

FSPs may provide services and interact with clients **in person** and through **telephony** and **digital** channels. In each case, it is important to provide **flexible, client-centric servicing processes** that are **easy to use and understand**, enable **communication in different formats**, and facilitate **client choice**.

Branch servicing models can provide flexibility to meet the needs of clients with disabilities through **dedicated service counters**, and providing **specialized staff** who are trained in different communication methods. However, even when branches are physically accessible, persons with disabilities may not be able to reach them, due to a lack of accessible transportation options at an affordable cost. Options to bring **in-person servicing closer to clients** include field staff, mobile banking units, village banking models, door-step banking, and agent networks.

Digital financial services provide an effective way to overcome distance, deliver services to a wide range of users, and facilitate two-way communications through live chat, as long as they are designed according to accessibility standards (see **section 4.3.2**).

Telephony channels, including phone lines at branches, call centres, and telephone banking, also enable servicing and communicating with clients regardless of location. However, they present barriers for clients with hearing and speech impairments or intellectual and psychosocial disabilities, due to issues such as audio-only interfaces, complex interactive voice response (IVR) systems, and reliance on voice-recognition systems.

These barriers can be mitigated to some extent by **building flexibility into systems and processes**, and enabling clients to choose options for **different communication methods** where possible. In some countries, services are available which enable persons with hearing impairments to use telephony systems through:

- **Text-based relay services (TRS)** which enable the user to communicate with the call agent via text through a third-party interface.
- **Video relay services (VRS)** which allow users to communicate with the call agent through a sign language interpreter, using video technology.

Action points:

- Offer a **range of channels for servicing and communications** with clients, e.g. accessible digital financial services, real-time text and voice communication via live chat, and telephone help-lines, as well as in-person servicing options.
- Allow clients to **register their preferred communication methods** on a voluntary basis.
- Provide **job-specific training to all client-facing staff, including call-center agents**, in accessibility, disability inclusion, and communication with persons with different types of impairments.

- Staff **should not make assumptions** about clients’ capabilities and support needs based on their appearance or attributes. Instead, they should **ask the client if they require assistance**, and offer appropriate options for support and accommodations.
- Allow a **trusted support person nominated by the client** to participate during in-person communications and phone calls.
- In branches, provide **dedicated service queues and counters** for persons with disabilities, and **train specialized staff** in communication methods such as sign-language.
- Improve accessibility of telephony systems by:
 - **Simplifying IVR menus**, and providing options to speak to a human agent.
 - Providing **alternatives to voice-recognition** for identity verification (e.g. keying a numeric passcode).
 - Ensuring **compatibility with speech-to-text tools** used by clients.
 - Using **TRS and VRS** services where available.

Resources:

- **Asian Development Bank (2025), ‘[Implementing Inclusive Design Principles in Banking Organizations](#)’**: Includes case studies and examples of inclusive servicing models for persons with different types of impairments.
- **Sightsavers (2023), ‘[Financial Inclusion for Persons with Disabilities in Kenya: A Rapid Review and Qualitative Study Report](#)’**, Research report from a study in Kenya, including findings on key barriers to accessing financial services experienced by persons with different types of impairments, and recommends strategies for FSPs to mitigate these.

4.4.4 Inclusive outreach

Making your products and services accessible and inclusive may not be enough to ensure persons with disabilities access and use them. Persons with disabilities frequently have **low awareness** of financial products and services and **lack confidence** to use them, and may have **limited trust** in financial institutions. In addition, **negative attitudes and stigma** from other community members may reinforce exclusion of persons with disabilities, for example, by making them reluctant to visit branches, or excluding them from savings groups or group loan products.

To address these barriers, take proactive efforts in collaboration with OPDs to **engage with persons with disabilities**, and bring information and services to them. For instance, this may include holding awareness-raising sessions about products, disseminating information through channels frequently used by persons with disabilities, or arranging visits from mobile banking units or agents.

These engagements **build trust** between FSP staff and persons with disabilities, and increase their confidence to interact with financial institutions, as well as providing opportunities to share **practical guidance and demonstrations** on how to use financial products and services. Awareness raising sessions that include persons with disabilities and other community members can help to **challenge negative stereotypes and stigma** associated with disability.

Action points:

- **Partner with OPDs** to plan and deliver inclusive outreach strategies for persons with disabilities.
- Ensure persons with disabilities are included in general **community awareness-raising sessions** about products and services, as well as providing targeted awareness raising sessions with OPDs.
- Use **communications channels** frequently used by persons with disabilities to share your commitment to inclusion, provide information about your products and services, explain the accessibility measures you offer, and publicize outreach activities. For example:
 - Identify social media groups used by persons with disabilities.
 - Radio is a commonly used channel in many countries, with some having radio stations or programs dedicated for persons with disabilities.
- During awareness-raising sessions, provide information in accessible formats about your **products, services and channels**, explain what **support you offer for persons with disabilities**, give **examples and live demonstrations** of products (e.g. using mobile apps), provide **hands-on support and guidance** for use, and offer **follow up support**.

Case study:

- **Fundación Paraguaya** Appointed ‘Inclusion Champions’ in eight cities to proactively seek out clients with disabilities, strengthen their capacities and confidence to use microfinance products, and provide ongoing support to manage their businesses, as part of its ‘Inclusive Opportunities in Microfinance’ project (2015 – 2016) supported by USAID. (Source: **Barrier-Free Finance Initiative (2025)**, [‘From pilot to mainstream: Fundación Paraguaya’s journey to serve people with disabilities \(PWD\) \(2012– 2025\)’](#))

4.4.5 Client trainings and capacity building

FSPs may provide training or capacity building for clients to empower them to make **positive changes in their lives and their communities**, in line with their social goals. Common areas for training and capacity building that are particularly relevant for persons with disabilities and their caregivers include:

- Personal growth and empowerment: understanding their rights, self-advocacy, strengthening self-worth and resilience to navigate challenges, fostering a sense of purpose for life.
- Financial literacy and financial management.
- Digital literacy and skills.
- Business management and entrepreneurship.
- Adapting to climate change impacts, including the use of ‘green’ financing products.

However, persons with disabilities are often **excluded** from these activities, or face **barriers to full participation**. Potential **accessibility barriers** include the training location and venue, materials, content, and methods of delivery. They may also be excluded as a result of **attitudinal barriers**, where trainers or other participants make assumptions that persons with disabilities cannot participate in, or benefit from, the training. In addition, persons with disabilities may **self-exclude** from activities due to low esteem and confidence, resulting from persistent exclusion and discrimination.

Take proactive steps to ensure persons with disabilities are **included and welcomed** in all training and capacity building activities you carry out, and that in-person, online or hybrid trainings are **accessible**, with **accommodations offered** to all participants. An overview of key accessibility considerations is provided in the action points below, with more detailed guidance in the resources listed in this section. You may also consider offering trainings that are **specifically targeted to persons with disabilities**, in collaboration with OPDs.

Action points:

- **Collaborate with OPDs and persons with disabilities** to plan and design the training, seek input and feedback on the accessibility of the curriculum and materials, and support outreach to persons with disabilities.
- Ensure **outreach includes persons with disabilities and their caregivers**. Make clear that persons with disabilities and their caregivers and support persons are encouraged to attend, and that accommodations will be provided.
- **Allocate a line in the training budget** for accessibility measures, and accommodations for participants with disabilities.
- Provide **multiple channels** to register for the training (in-person and via QR code, text, phone etc.), and ask all participants about **accessibility needs and accommodation requirements** in advance.
- Provide **key information about the training in advance**, such as accessibility information about venues, and how to use accessibility features of online platforms.
- Content and delivery:
 - Provide **training to trainers and facilitators** on disability inclusion, accessibility, disability etiquette and communication with persons with different types of impairments (see **section 2.3.5**).
 - **Brief speakers on inclusive presentation practices**, such as speaking slowly and describing visual information, and inform them of accessibility needs of participants.
 - Plan the agenda to allow **time for breaks**.
 - Ensure content addresses **issues relevant for persons with disabilities**. For example, including training on using accessibility features of smart phones during financial and digital literacy training.

- For in-person trainings:
 - **Choose a location close to participants' homes**, and / or consider providing **subsidies for costs of travel** to the venue for persons with disabilities.
 - Offer training materials and handouts in **accessible and alternative formats** (see **section 4.3.3**).
 - Adapt **interactive exercises** to be inclusive of persons with different types of impairments, for example:
 - Replace physical or high energy activities with all-seated activities.
 - Offer multiple ways for participants to give input (e.g. verbally, selecting pictures, writing on sticky notes, etc.).
- **For on-line training events (see also section 4.3.2 on digital accessibility):**
 - Use an online meeting platform with user interfaces that **conform to Web Content Accessibility guidelines (WCAG)**- for example Zoom, Microsoft Teams, Google Meet.
 - Enable the **built-in accessibility features** of the online meeting platform, such as automatic captioning, transcripts and user-customizable settings.
 - Provide **additional accessibility solutions and accommodations** such as manual captioning and sign language interpretation, as required by participants.
 - Provide multiple ways and formats for participants to **ask questions or provide input** (e.g. verbally, using the chat feature, through a support person).

Case study:

- **Chamroeun Microfinance plc and NGO Good Return** collaborated to deliver Good Return's Consumer Awareness and Financial Empowerment (CAFE) coaching program to persons with disabilities in Cambodia. They partnered with OPDs and disability support organizations to adapt training materials for accessibility and adapt training delivery methods, and trained staff of Chamroeun and four OPDs to deliver the coaching program to persons with disability and OPD members, including blind and visually impaired persons. **(Source: Good Return and Chamroeun Microfinance Plc (2023), '[Finance for All: A practical guide to Disability Inclusion for Financial services Providers in Cambodia](#)', Disability Action Council of Cambodia & ACCESS Program)**

Resources:

- **Opportunity International (2025), '[Inclusive Finance Accessible Training & Meeting Cheat Sheet: In-Person / Virtual Meeting or Training for Inclusive Finance](#)**: Tips for holding inclusive and accessible in-person and online trainings.
- **UNICEF (2022), '[Toolkit on Accessibility: Section F: Organization of Accessible Events](#)**: Comprehensive guidance and checklists for different types of in-person events

- **CBM (2021), ‘[Toolkit: Accessible Meetings](#)’,** Comprehensive guidelines, checklists and resources for accessible in-person meetings
- **CBM, ‘[Checklist for virtual meetings](#)’.** Simple checklist and tools for holding accessible remote meetings.
- **W3C, ‘[Accessibility of Remote Meetings](#)’:** Comprehensive accessibility considerations and guidelines for remote and hybrid meetings.
- **Lulli, R. and Riaza, R. (2012), ‘[Toolkit: Accessible Meetings and Events](#)’, European Disability Forum (EDF),** Guidelines for accessible online and in-person events, including comparisons of accessibility of online platforms.

4.5 Client protection

The primary obligation of FSPs to their clients is to **“do no harm”**. This means implementing client protection frameworks to ensure that clients do not experience adverse consequences from using your products and services, or from interactions with the FSP and its representatives.

To ensure effective protection of all clients, your policies should **address barriers** that may prevent them from working effectively for persons with disabilities, in particular due to inaccessible information and communications channels, and discrimination or bias. In addition, you should address areas where clients with disabilities are at **greater risk of negative outcomes** from using your products and services, and take steps to mitigate these risks.

4.5.1 Transparency, fair treatment and safeguarding

At the core of client protection is the requirement to providing **clear and transparent information** to all clients so that they can: understand pricing and terms and conditions of products or services; understand their contractual rights and obligations and those of the FSP; make informed decisions when selecting and using products and services; request information and raise questions or concerns. This information should be available in **accessible formats** for clients with disabilities, and **communicated in ways they can understand**.

In addition, the Code of Conduct should specify the **ethical standards and behaviors** expected of all FSP staff and third-party service providers, including **fair and respectful treatment and non-discrimination**, and the consequences of breaching these standards. It should provide clear **definitions and examples of unacceptable behaviors**, and prohibit any form of **abuse or exploitation of clients or community members**, including threats, intimidation, physical violence, and sexual exploitation, abuse and harassment (SEAH).

Accessible and inclusive complaints mechanisms should be established to ensure that all clients, including persons with disabilities, know how they can safely raise concerns, seek redress, and report misconduct or abuse.

Certain clients, including persons with disabilities, women, and other groups such as displaced persons, are more **vulnerable to abuse or exploitation** due to factors such as isolation, dependency on caregivers, communication barriers, low financial literacy, and fear of reporting abuse. Risks of abuse or exploitation are also heightened by **power imbalances between FSP staff and vulnerable clients**, in particular during loan collection processes.

These risk factors should be identified within your client protection policies and highlighted in staff training. Client protection can be enhanced by implementing a **dedicated safeguarding policy** to provide a comprehensive framework for preventing exploitation, abuse and harassment, particularly against vulnerable clients, including persons with disabilities.

More advanced practices include training staff to identify **potential indicators of financial exploitation and abuse** of clients by third parties, including family members or caregivers, and report these internally. However, investigating and responding to situations of potential exploitation and abuse carries a **significant risk of causing harm** to the vulnerable party. FSPs without specialized skills in this area should refer suspected incidents to an experienced third party.

Action points:

- Provide key information to clients in accessible formats and through accessible channels (see **sections 4.4.3**), including:
 - Key Facts Summary Document.
 - Product documentation, including loan contracts, savings account documentation and insurance policies.
 - Clear and accurate transaction and balance information.
 - Timely information during the insurance claims process.
 - Loan repayment reminders.
 - Information about data use and consent.
 - Information about their rights as clients and behaviors that are prohibited under your code of conduct.
 - How to report complaints.
 - Confirmation of receipt of complaints, and notification when the complaint has been resolved.
- **Train all client-facing staff**, including those involved in collections processes and complaints handling, to ask clients about their communication needs, and communicate this key client information respectfully and effectively to persons with different types of impairments (see **section 2.3.5**)
- Provide a range of **channels for clients to submit complaints** which are both **accessible and confidential** (e.g. SMS, website, voice channels (phone / online chat)).
- Communicate client protection policies to **agents and other servicing partners**, work with them to build their capacity to implement these, and put in place procedures to monitor their compliance.
- Identify **client groups that are at higher risk of exploitation and abuse**, including persons with disabilities, and communicate these to staff through the Code of Conduct and training.
- Consider implementing a **dedicated safeguarding policy** identifying vulnerable client groups and covering mechanisms for complaints and incident reporting; confidential and survivor-centered investigation processes; and provision of support for survivors.

Example:

- **VisionFund**, the microfinance network of World Vision, has explicitly recognized power imbalance risks between loan officers and vulnerable clients. VisionFund has developed a dedicated safeguarding framework covering prevention of sexual exploitation, abuse and harassment (SEAH), client protection, staff conduct, complaint mechanisms, and survivor-centered response. **Jezreel Hannah Domingo (2025), ‘Safeguarding in microfinance: from ‘Nice-to-Have’ to ‘Must-Have’**, Bond, 24 November 2025

4.5.2 Loan decisioning and approval processes

Credit decisioning processes, both manual and automated, should be based on **assessment of the client’s repayment capacity**. Typically, these processes use data such as the client’s income and expenditure, employment status and history, financial behaviors, and credit history. These processes can create **barriers for persons with disabilities** which limit their access to credit from formal providers, leaving them more likely to turn to riskier informal credit sources.

In **manual processes** discrimination or exclusion of persons with disabilities may occur due to:

- **stereotypes and biases of FSP staff**, for instance where staff exclude persons with disabilities, or make assumptions about their capacity to earn income or manage credit products, on the basis of their disability, without making an individual assessment.
- **over-reliance on traditional documentation**, such as employment records as evidence of income, which can disproportionately exclude persons with disabilities because they have higher rates of informal or self-employment.

Automated processes using algorithms may disadvantage persons with disability through:

- Relying on **historical data-sets** that reflect past exclusion and discrimination related to disability (e.g. higher decline rates).
- Using **proxy variables** to indicate risk that correlate with disability (e.g. gaps in employment, high healthcare expenditure, income volatility, receiving benefits).
- **Under-representation of persons with disabilities** in training data for Artificial Intelligence (AI) algorithms, which may lead to penalization of ‘non-standard’ client profiles or behaviors.

Action points:

- For manual processes:
 - **Prohibit use of disability** as a factor in assessing creditworthiness, as this violates non-discrimination principles.
 - **Train credit officers** on disability inclusion, legal capacity, and unconscious bias.
 - Base all credit decisions on the **individual’s financial circumstances**, using cashflow analysis that includes informal sources of income, and disability benefits.
 - Include a **review of decisions** by a second staff member.

- **Document decisions** to ensure transparency and accountability.
- For automated and algorithmic processes:
 - Use **data-sets including diverse population sub-groups** to train AI algorithms.
 - Include disability inclusion in **model risk management frameworks**.
 - **Review models** for potential disability-related bias.
 - **Test outcomes of models** at least annually, including **testing for bias against persons with disabilities** and other protected categories.
 - Provide accessible channels for applicants to **request a manual review** of decisions.
 - Increase **transparency of how algorithms work** and the factors they consider.
- For all decisioning processes:
 - Carry out **disaggregated-data analysis** of approval and decline rates by disability, age and gender to identify patterns of exclusion.
 - Provide **reasons for rejection** to clients in accessible formats and communication channels.
 - Consult with **OPDs or independent experts** to review decisioning practices.

4.5.3 Equitable access and risk mitigation

Some persons with disabilities may be at **greater risk of negative consequences** related to using financial products and services. For example, clients with disabilities may have difficulties in understanding information about products and services, leading to an increased risk of financial loss due to **transaction errors, misunderstanding of product terms and conditions, or fraud**.

In addition, persons with disabilities, in particular persons with visual impairments or intellectual and psychosocial disabilities, may be **forced to rely on third parties** to help them open accounts, log-in or make transactions. This compromises their data privacy and security, putting them at greater risk of fraud and financial abuse. These risks arise from the **interaction** between the individual's impairment and **barriers created by**:

- **Inaccessible infrastructure and interfaces**, such as ATMs or online banking apps.
- **Lack of alternative authentication methods** for persons who have difficulties remembering information such as Personal Identification Number (PIN) codes or passwords.
- **Complex product information and contracts**.
- **Communications** that do not meet clients' needs and preferences.
- **Time-limited or pressured sales processes**.
- **Inaccessible and complex processes** for making transactions.
- **Discriminatory eligibility criteria** that exclude persons with certain types of impairments, or force them to nominate third parties to access or operate accounts on their behalf.

Instead of restricting their access, you should focus on enabling and supporting clients with disabilities to access and use your products and services **autonomously and safely**. This includes ensuring **accessibility** of servicing channels and information, **flexible servicing and communications**, and providing appropriate processes and product features that help to **safeguard clients against risks**.

In addition, your policies should enable **supported decision-making** practices. These allow clients with disabilities to nominate a trusted support person to help them with decision-making, while making it clear that the client remains the primary decision-maker, recognizing their autonomy, will and preferences. This is very different from policies that force clients with disabilities to involve third parties in managing their finances, or impose **substitute decision-making** mechanisms such as guardianships, where a third party takes decisions in place of the client.

Action points:

- Ensure policies **recognize the legal capacity** of all persons with disabilities and prioritize their right to access, while identifying appropriate measures to **mitigate risks**.
- Remove **discriminatory policies** that exclude or restrict access based on types of impairments or medical diagnoses (see **section 4.2.2**).
- Improve the **accessibility** of all channels, user interfaces, information formats and communications to enable clients with different types of impairments to access products and services independently (see **sections 4.3 and 4.4.3**)
- Provide a range of **alternative methods** for customer identification, account log-in and transaction authorization (see **section 4.5.4**)
- **Allow additional time** for explanation and decision-making processes where needed.
- Establish procedures that enable clients with disabilities to **nominate a trusted person** to support them in decision-making, at their request.
- Offer appropriate products, including **entry level savings and transaction accounts** with basic functions, which are easy to understand and use for all clients, including persons with intellectual or psychosocial impairments, and other groups such as older persons and those with low levels of financial literacy.
- Offer **optional product features** that help clients to manage their accounts, make more informed decisions, and reduce the risk of fraud or transaction errors; for instance:
 - Ability to **set transaction limits or weekly / monthly spend limits** agreed by the user.
 - **Real time notifications** for approval of transactions over an agreed limit, sent to the client (and / or a support person if requested by the client).
 - Ability to **designate different ‘pots’** within one account for different types of spending and saving.
 - Ability to grant **read only access to online accounts for a support person**, with the client’s consent.
 - **Wearable alternatives to cards** that are less likely to be lost or stolen, such as wristbands.

Case studies:

- Sightsavers (2023), '[Financial Inclusion for Persons with Disabilities in Kenya: A Rapid Review and Qualitative Study Report](#)'. This study in Kenya found some FSPs required persons with visual impairments to nominate a third party to access their accounts on their behalf, or denied them ATM cards for reasons of data security. At the same time, persons with visual disabilities reported issues with inaccessible ATMs screens. The report summarizes the barriers faced by persons with different types of impairments, and recommends strategies for FSPs to mitigate these.
- **Project Nemo (2025)**, '[Safe Spending for Adults with a Learning Disability: A Call to Action for Financial Services](#)'. This research in the UK found persons with learning disabilities face significant barriers to accessing and using financial services, which forces them to adopt workaround solutions that compromise their data privacy and security, and / or increase their dependency on others. The study found 87% of persons with learning disabilities who used financial services adopted informal workarounds, while 43% had made formal arrangements with a support person. The report provides more detailed findings and recommended actions for FSPs to support safe and independent access for persons with learning disabilities.

4.5.4 Identification, authorization, and verification

Client protection principles require **secure mechanisms for client identification and verification** during account acquisition and onboarding, and authorizing transactions. Traditionally, this has been achieved by clients **signing a physical document**, which can **create barriers for persons with disabilities** who are unable to provide a written signature, or have difficulty providing a consistent signature, for instance due to physical impairments, impaired motor skills, or visual impairments.

Digital financial services offer greater flexibility through electronic account opening, log-in and transaction authorization processes. These processes may use **identification and verification mechanisms** such as electronic signatures for documents and contracts, passwords or PIN codes, captchas, biometric identification, or 2-factor identification using email, SMS, authentication apps.

You should provide a range of secure options for client identification, transaction verification and authorization that are **understandable and operable** for persons with different types of impairments, in both physical and online settings. **Providing a range of options is essential**, as persons with different and / or multiple types of impairments will require different solutions. In addition, these alternatives often benefit other groups who experience similar barriers to persons with disabilities, such as persons with low literacy levels and older persons.

Action points:

- Ensure policies and procedures identify a **range of alternatives to record the client's consent** during **in-person account acquisition processes**, for example:
 - Accepting a thumbprint instead of signature.
 - Providing a stamp for clients with disabilities to use in place of a signature.
 - Allowing consent to be provided verbally or by sign-language, recorded on video.
- Provide options for clients to use **accessible electronic signature or verification methods** during in-person transactions, e.g. through accessible portable devices.
- Provide digital financial services with accessible interfaces (see **section 4.3.2**) and:
 - Ensure secure log-in can be completed through **at least one alternative to biometric authentication**.
 - Provide a **range of authentication processes that clients can select**, such as through SMS, voice recognition and biometrics.
 - Ensure **electronic signature can be completed using accessible controls**, including using key-board only input and screen readers.
 - Provide **alternatives to visual captchas**.

4.6 Inclusive employment

Inclusive employment means ensuring all employees are treated **fairly, respectfully and without discrimination**, have **decent work conditions**, and enjoy **equal opportunities**, in all aspects of their employment. These rights are articulated in the UNCRPD, and are legal requirements in many countries.

4.6.1 Recruitment and onboarding

As the initial stage of the employment lifecycle, inclusive recruitment practices are an essential prerequisite for equal participation of persons with disabilities in the workforce.

The aim of inclusive recruitment is to create fair and barrier-free processes that ensure **equal opportunities for all candidates** to apply and succeed based on their merits. It involves proactive measures to ensure **non-discrimination, minimize bias, enable accessibility, and offer reasonable accommodations** at every stage of recruitment, including job advertisements, candidate sourcing, screening, shortlisting, selection, and onboarding. It also provides an opportunity for FSPs to **demonstrate their commitment to inclusion**, and assess whether candidates share these values.

Job descriptions and advertisements should reference only the criteria required to perform the essential functions of the job, without excessive requirements that may unintentionally exclude suitable candidates. Include wording that actively encourages persons with disabilities to apply, and use **diverse and targeted outreach channels** to source candidates.

Candidate screening and assessment processes may include interviews (in-person, telephone or video); assessment tests (written or online); exercises (such as role-plays and group-working scenarios); and practical tests of job skills. In each case, review the process to identify **accessibility barriers** for persons with different types of impairments, take steps to mitigate these, and offer **reasonable accommodation or alternatives** to ensure candidates with disabilities are not disadvantaged.

Staff responsible for the recruitment process should implement measures to mitigate the impact of **unconscious bias** in **candidate screening, selection and assessment processes**. Screening processes that use **AI algorithms** present particular risks of bias against candidates with disabilities, in particular algorithms that screen video interviews using candidates' **physical attributes, communication patterns, or mannerisms**.

Action Points:

- Review the **end-to-end recruitment process** and identify and remove barriers at each stage, to ensure accessibility for candidates with different types of impairments.
- Make explicit reference to the **availability of reasonable accommodations** across all stages of the recruitment process and **explain how candidates can request them**. Provide information about the steps in the process in advance to help candidates to anticipate their accommodation needs.
- Use **targeted outreach to encourage applications from persons with disabilities**, such as outreach through OPDs; organizations providing education, training or job-seeking services for persons with disabilities; and participation in disability specific job fairs or events.
- Develop job descriptions and advertisements using **clear, factual descriptions of the essential functions of the role** and the **competencies required**. Avoid vague or discriminatory terms such as 'person in good physical condition' or 'able-bodied', and excessive requirements for qualifications, length of experience, etc.
- In job advertisements, highlight your **commitment to inclusive employment**, and state that you welcome applications from all groups of society, including persons with disabilities.
- Provide job advertisements, application forms and response channels (telephone, online, email etc.) and related documents and instructions in **accessible and alternative formats**. **Test online application systems** to ensure accessibility (see **section 4.3**).
- **Train staff involved in the recruitment process**, including HR staff and line managers, on reasonable accommodation, inclusive employment practices, and unconscious bias.
- Identify **objective selection criteria based** on the competencies required for the job and commitment to the FSP's values, and develop **structured tools and processes** to assess candidates against these criteria.
- In interviews, **ask all candidates the same questions**, focused on the candidate's ability to do the job, and do not ask questions related to disability or ask for medical information.
- Avoid using **algorithmic screening processes** unless models have been developed using a **diverse data-set** that includes persons with disabilities, and are **tested regularly for bias against persons with disabilities**.

- Include a **manual review process of automated screening outcomes**, and provide candidates with disabilities with an **option to request an alternative assessment method**.
- Ensure candidate selection decisions involve **at least two people, or a selection panel**, to reduce the impact of individual bias on decision-making.
- **Seek feedback from candidates** on the recruitment experience, including accessibility and inclusiveness, to enable ongoing improvements.
- During onboarding, provide all information, including the employee contract and Code of Conduct, in **accessible formats** (see **section 4.3.3**), and ask about the new employee's accessibility and accommodation needs, so that these can be provided as soon as they join.

Resources:

- **International Finance Corporation (IFC) (2022)**, '[Inclusive Banking: Emerging Practices to Advance the Economic Inclusion of Persons with Disabilities](#)': Includes examples and case studies on inclusive and targeted recruitment
- **Humanity & Inclusion (2020)**, [The inclusive recruitment process](#): Factsheet including a step by step approach to the inclusive recruitment process.
- **Inclusive Futures**, [The disability-confident employers' toolkit](#): This downloadable folder offers practical tools including inclusive recruitment guides and checklists, proactive recruitment strategies, workplace accessibility audit checklists, inclusive communication guides, and resources on including persons with intellectual disabilities in the workplace.
- **Light for the World (2017)**, [Resource book on disability inclusion](#): Incorporates a series of factsheets covering a range of disability inclusion topics. Factsheet 22 focuses on inclusive recruitment.

4.6.2 HR management and development

Disability-inclusive employment is underpinned by HR policies and procedures that:

- **prohibit discrimination** on the basis of protected characteristics, including disability;
- articulate the right of employees with disabilities to an **accessible workplace** and provision of **reasonable accommodation**;
- ensure **equal opportunities** for persons with disabilities in all aspects of employment, including pay and benefits, career development opportunities, and promotion;
- enable employees with disabilities to **raise concerns, report issues and provide feedback** to management on a confidential basis;
- **protect employees from harassment** in the workplace, including sexual harassment, abuse and exploitation;
- **protect the health and safety** of persons with disabilities in the workplace (see **section 4.6.3**).

For these measures to be effective in practice, **all staff should receive training** to enable them to understand and implement these policies, and interact respectfully with colleagues with disabilities, and should know how to find information if they have **questions about disability inclusion**.

Take steps to make your **workplace premises and IT systems accessible** to persons with disabilities (see **section 4.3**). In addition, you should provide **reasonable accommodation** to enable individual employees with disabilities to perform their job to their full potential, and participate in work activities on an equal basis. This requires processes that **enable all employees to request accommodations** during onboarding and orientation, as part of return-to-work procedures after illness or accidents, and any time during their employment. Workplace accommodations may include a wide range of measures, many of them simple and inexpensive, including (but not limited to):

- Adjusting workplace layouts to assist navigation.
- Workstation adjustments.
- Providing information in accessible formats.
- Providing assistive technologies.
- Flexible working arrangements, such as remote working or adjusted working hours.
- Implementing protocols for inclusive in-person and online meetings.

It is important to **collect feedback** from employees with disabilities, both on their satisfaction with the overall workplace experience, and in relation to specific areas such as accessibility, non-discrimination and inclusion. You should also provide accessible and confidential channels for employees with disabilities to **raise grievances**, or **report incidents of harassment** in the workplace.

Monitor the effectiveness of your inclusive employment practices by analyzing workforce data **disaggregated by gender, age and disability** to identify potential areas of inequality in the recruitment, remuneration, promotion and retention of persons with disabilities.

Action points:

- Find out about applicable **legal and regulatory requirements** relating to non-discrimination, equal opportunity, accessibility and reasonable accommodation in the workplace for persons with disabilities.
- Review and amend HR policies where necessary to articulate employees' rights and responsibilities relating to **non-discrimination, workplace accessibility, and reasonable accommodation**.
- Consider nominating **disability inclusion focal point(s)**, to provide a point of contact and support for employees with disabilities, and for staff with questions on inclusive practices.
- Establish accessible processes for both new and existing employees to **request workplace accommodations**, and to assess and fulfill these requests.
 - Information requested from employees should focus on barriers they experience rather than medical diagnosis, and should be treated as confidential.
- **Co-design reasonable accommodation measures** in collaboration with the employee. Consult with OPDs, disability support organizations, or specialized solution providers if necessary.
- **Allocate a centralized budget** to provide reasonable accommodations.
- Adopt **flexible work practices for all employees** which give a degree of control over how long, where, when and/or at what times they work, where possible.

- Ensure all **staff training and development activities**, including orientation and induction programs, are accessible, and provide reasonable accommodation to enable employees with disabilities to participate fully.
- Design **performance evaluation, remuneration and promotion processes** based on objective performance criteria linked to job descriptions and role levels.
 - Incorporate measures to mitigate bias by individual managers, including **reviews of decisions and outcomes** by HR and management panels.
- In **staff satisfaction surveys**:
 - Include a mechanism for **voluntary disclosure of employees' disability status**.
 - Include **questions for all employees** related to inclusive culture, non-discrimination, workplace accessibility, and availability of reasonable accommodation.
 - **Analyze responses by disability status, gender and role level** for all dimensions and questions, where possible (in general, each sub-group should include at least ten employees to maintain the anonymity of respondents).
 - Where disaggregation by disability status is not possible (e.g. for FSPs with smaller workforces), **provide alternative and accessible channels** for employees with disabilities to provide **confidential feedback**.
 - Use data to identify **areas for improvement** in workplace culture, policies and practices, and build these into operating plans.
- Establish confidential and accessible procedures and channels to enable persons with disabilities to **raise grievances or report harassment** in the workplace, including sexual harassment.

Resources:

- **United Nations Global Compact & International Labour Organization (ILO) (2017), [Guide for Business on the Rights of Persons With Disabilities](#)**: Provides an overview of disability inclusion for private sector entities, and practical guidance on embedding the rights of persons with disabilities into organizational policies and processes. It outlines how businesses can promote equal opportunities in the workplace, in the market, and within the wider community.
- **ILO (2016), [Promoting Diversity and Inclusion through Workplace Adjustments: a Practical Guide](#)**: Practical guidance on processes for applying reasonable accommodation across the employee lifecycle, with examples and practical resources, including an example policy on reasonable accommodation.
- **World Blind Union and CBM Global Disability Inclusion, K. Al Jubeh, B. Dard, Y. Zayed (2020), ['Accessibility GO! A Guide to Action, Delivering on 7 accessibility commitments'](#)**: a comprehensive guide to accessibility and inclusion, covering workplace accessibility, staff training and capacity development, recruitment, employment and reasonable accommodation, with self-assessment templates in each section.

- **CBM (2017), [Disability-Inclusive Development Toolkit](#)**: This toolkit for inclusive development includes section 2.3 “Inclusive management practices and practices” which covers inclusive recruitment, retention and professional development of staff, and workplace adaptations and modifications, with case studies and examples.
- **Humanity & Inclusion (2020), [Inclusive Employer Toolbox](#)**: Includes factsheets and practical guides on good practices, supported by case studies and video testimonies, across five dimensions: Policies & leadership, HR & management, internal culture, physical & digital accessibility, and partnerships.
- **Humanity & Inclusion (2020), [Factsheet: Integrating and compensating for disability at work](#)**: Provides guidance on integrating persons with disabilities in the workplace through reasonable accommodation and workplace adjustments.
- **Humanity & Inclusion (2020), [Factsheet: Examples of workstation adaptation](#)**: Provides concrete examples of adaptations for employees with different types of impairments.
- **Opportunity International (2025), [‘Workplace Accessibility Needs Assessment Form’](#)**, Template for a simple form to identify accessibility needs of employees with disabilities.

4.6.3 Workplace health and safety

Employees with disabilities may experience **particular risks** in all health and safety dimensions, including physical and workplace risks, psychosocial and mental health risks, and emergency and disaster-related risks.

To fulfill your obligations to safeguard all employees, and comply with legal requirements in many countries, you should ensure workplace health and safety (WHS) practices integrate considerations for employees with disabilities across all areas, including **risk assessments, risk mitigation, emergency procedures, incident reporting, and staff training**. This should be carried out in collaboration with employees with disabilities, and specialized service providers where required.

A WHS risk assessment is a systematic process to **identify potential hazards** in a work environment, evaluate the **risk of harm**, and implement control measures to **eliminate or mitigate those risks** in order to protect employees. The WHS risk assessment process should be designed to identify how work environments, job tasks, tools or processes may **create specific hazards or increased risks** for persons with different types of impairments, and take steps to address these.

In some cases, this may require **individualized risk assessments** for employees with disabilities to consider their individual needs and working arrangements. These assessments, and the design of risk mitigation measures, should be undertaken in consultation with the employee. Risk mitigation measures may include **adaptations to the workplace** (e.g. improving accessibility of signage, adjusting lighting), and / or provision of **reasonable accommodations** to mitigate the risk of harm for individual employees (e.g. providing ergonomic furniture, adjusting screen settings).

Emergency planning is a crucial element of workplace health and safety. You should design and implement gender-sensitive and disability-inclusive plans and procedures for **emergencies and evacuations**. All components should be accessible for employees with different types of impairments, including **information and training; alarms and alerts; evacuation procedures, routes and signage; and safe refuges**.

Some employees with disabilities may require an individualized plan, known as a **Personal Emergency Evacuation Plan (PEEP)**, that sets out how the individual will be supported to evacuate in the event of an emergency. This may involve measures including specific **communication methods**, **assistance from other employees** and / or the provision of **specialized equipment**, such as evacuation chairs.

Action points:

- **Train staff responsible for WHS** on disability-inclusive risk management, and train building / floor wardens and managers on inclusive evacuation support.
- **Identify and assess risks faced by employees with disabilities** as part of WHS risk assessments, and carry out **individualized assessments** where required. WHS risk assessments should include risks related to:
 - Workplaces, equipment, tasks and processes.
 - Psychosocial risks (workload, stress etc.), with particular consideration for employees with intellectual or psychosocial impairments.
 - Emergency and evacuation procedures.
- **Consult employees with disabilities, workers representatives, and specialized disability and WHS organizations** to assist in the design of WHS risk assessment processes, risk mitigation measures, and accessible emergency and evacuation procedures.
- **Do not assume** that all employees with disabilities require a PEEP. The decision should be taken in collaboration with the employee.
- Where it is **agreed with an employee that they require a PEEP**:
 - develop the PEEP in consultation with the employee, and specialized disability and WHS organizations.
 - procure and test specialized equipment if required.
 - assign roles and responsibilities during an emergency.
 - where applicable, train identified employees to assist in evacuation, including in the use of specialized equipment.
- Provide all WHS information, including training materials, emergency and evacuation plans and procedures, and PEEPs, in **accessible formats** for employees with disabilities (see **section 4.3.3**).
- Provide **inclusive and accessible trainings**, including induction training, refresher courses, and safety briefings.
- Conduct **periodic drills** that include employees with disabilities. In **reporting of WHS incidents**, incorporate voluntary disclosure of the disability status of employees involved. This enables data analysis to highlight previously unidentified risks, identify mitigation measures, and strengthen procedures.
- **Update WHS procedures** as roles, environments, or technologies change.

Resources:

- European Agency for Safety and Health at Work (2004), [Ensuring the health and safety of workers with disabilities](#): This factsheet includes an overview of the legal requirements within the EU, and detailed action across the health and safety management system including checklists.

4.7 Partnerships

4.7.1 Partnerships with organizations of persons with disabilities (OPDs)

Organizations of persons with disabilities (OPDs) are civil society organizations led and run by persons with disabilities and / or their caregivers, which advocate for disability rights and inclusion, and / or provide services for their members.

Active participation of OPDs and persons with disabilities is a central principle of disability inclusion, and underpins all the practices outlined in this guide. You should partner with OPDs in designing and implementing your disability inclusion strategies and practices, to ensure that they reflect the lived experience of persons with disabilities, and create positive outcomes aligned to their needs.

Partnerships with OPDs can support your disability inclusion goals in many ways, including:

- **Improving your understanding** of the needs of persons with disabilities and the barriers they face to access financial services.
- **Enabling outreach** to persons with disabilities.
- Supporting **awareness raising and training** for staff.
- Gaining **input and feedback from persons with disabilities** when designing and updating your products, services, channels, information and communications.
- **Facilitating referrals** of persons with disabilities as potential clients for your financial and non-financial services.

OPDs and their members also benefit from partnerships with FSPs, and from collaborating in their activities. Potential benefits include:

- Increasing their **understanding of financial products and services**, and their confidence in interacting with FSPs.
- **Increased access** to financial products and services that meet their needs.
- **Participating in training** provided by the FSP.
- **Building new skills** through participation in FSP initiatives.
- **Potential employment opportunities** with the FSP.
- **Capacity-building support** from the FSP to strengthen the OPD's organizational management.
- Building enhanced capacity to **advocate for broader financial inclusion** of persons with disabilities.

The board and leadership team should proactively seek and build relationships with OPDs that are rooted in mutual learning, understanding, respect and trust. This requires a number of steps:

1 Identifying suitable OPD partners

In most countries there are a number of OPDs, often covering a specific geographical area and / or representing specific groups such as women with disabilities or persons with particular types of impairments. Many countries also have a **national ‘umbrella’ OPD**, of which most other OPDs are members. There are also **regional OPDs** which have member organizations from several countries.

You may choose to partner initially with the ‘umbrella’ OPD, which can support outreach to other OPDs, and / or to partner with other OPDs aligned with your target client base and strategies. Ideally, seek OPD partners that **represent the diversity of persons with disabilities** (e.g. gender, age, types of impairments, etc.) within your target client base.

You should also consider the capacities of potential OPD partners to support your disability inclusion plans. If they have limited knowledge of financial services or experience collaborating with private sector organizations, you may need to provide subject-matter specific training to support them.

2 Starting the dialogue

Open and honest dialogue is required for both parties to **build an understanding** of each other’s perspective, and **challenge stereotypes and misconceptions** on both sides. For instance, reflecting broader social norms and attitudes, FSP staff may perceive persons with disabilities as riskier clients (especially for credit) who are better served by grants or charity. OPDs, having experienced exclusion or negative treatment by FSPs, may view all FSPs with suspicion and mistrust. They may have limited understanding of how financial institutions and financial products operate, and due to societal conditioning, may have expectations of receiving free or subsidized services.

3 Agreeing parameters

You may initiate approaches to OPDs as part of your **broader disability inclusion strategy** and / or to **support a particular intervention**, such as a branch accessibility or staff training program. In either case, discuss and agree your respective goals and objectives, what each will bring to the relationship, and your expectations of each other.

You should **approach the relationship with the OPD as an equal partnership**, with contributions and benefits for both parties. Where OPDs provide specific contributions to your initiatives, such as conducting accessibility assessments or user-testing, you should provide **payment for these services**, as for any other service provider.

4 Ongoing relationship building

Take time for **ongoing dialogue with OPD partners** to reflect on and deepen the relationship, and identify further areas to collaborate together.

Action points:

- **Nominate a manager** to build relationships with OPDs and act as the focal point for OPD partners.
- **Provide training to all staff who engage with OPD partners** (as relationship managers or through specific initiatives), covering disability inclusion, accessibility, and communication with persons with different types of impairments.
- **Identify and engage** with potential OPD partners.
 - Connect with regional / national ‘umbrella’ OPDs to make contact with other OPDs (links to regional OPDs are provided in the resources listed in this section).
 - Seek partners with member representation, experience and capacities aligned to your goals, and provide sensitization and training where required.
- **Build and develop OPD partnerships**, recognizing and valuing OPDs as equal partners:
 - Start a dialogue with potential OPD partners to build mutual understanding.
 - Agree goals, objectives and expectations for the partnership, and formalize these in a simple relationship agreement.
 - Maintain regular dialogue with OPD partners, including periodic reflection sessions to share information, feedback and learnings.
 - Look for opportunities to deepen collaboration.
- Provide **capacity building support** for OPD staff and members to strengthen financial management and governance practices.
- **Facilitate participation of OPD partners** in the process of designing and developing disability inclusion strategies, and in developing or upgrading products, services and channels (see **section 4.4.1**):
 - Discuss and agree objectives, roles and expectations in advance.
 - Provide payment for contributions of OPD staff or members to your initiatives, recognizing the value of their time and expertise.

Resources:

- Goldstein, J. et al (2014), ‘[A New Financial Access Frontier: A Framework for Disability Inclusion](#)’, CFI at Accion: Guidance for FSPs to build partnerships with OPDs (pages 9-11)
- CBM, ‘[Inclusive Participation Toolbox: Working with OPDs](#)’: Provides summary guidelines for collaborating with OPDs.
- Contacts for regional OPDs (**Source: CBM (2021), ‘[Toolkit: Accessible Meetings](#)’**), :
 - African Disability Forum: africandisabilityforum@gmail.com
 - Arab Organisation of Persons with Disabilities: aodp@cyberia.net.lb
 - ASEAN Disability Forum: secretariat@aseandisabilityforum.org

- European Disability Forum: info@edf-feph.org
- Latin American Network of Non-Governmental Organisations of Persons with Disabilities and their Families: info@riadis.org
- Pacific Disability Forum: pdfsec@pacificdisability.org

4.7.2 Other partnerships and networks

Disability support organizations may promote or implement disability inclusion activities, provide related support services, and support disability advocacy, but are not member-based organizations run by persons with disabilities. They include government bodies, NGOs, for-profit organizations, and community groups. You may collaborate or partner with disability support organizations to:

- assess your current disability inclusion practices, create disability inclusion strategies and action plans, and provide technical support for implementation.
- provide training for your staff.
- provide specialized services, e.g. digital accessibility evaluations, production of accessible communications materials.
- connect with OPDs and the wider disability community.

International, regional or local networks focused on disability inclusion provide members with access to resources, and opportunities for organizational capacity building through events, webinars, and peer-to-peer learning.

Financial sector networks and associations can play a key role in advancing the inclusion of persons with disabilities in financial systems at a national, regional and international level, by sponsoring or leading disability inclusion initiatives, and providing resources and capacity building for FSP members. FSPs can also encourage networks and associations to prioritize and support disability inclusion as a strategic area of focus.

Action points:

- Build relationships with **disability support organizations** to:
 - seek specialized expertise to create and implement disability inclusion plans.
 - connect with OPDs, underrepresented groups of persons with disabilities, specialized service providers, disability inclusion networks, and the wider disability community.
- **Find out about disability inclusion networks and forums** that could help to advance your disability inclusion strategy. The resources list in this section provides some examples.
- **Encourage and support activities to advance disability inclusion** through financial sector networks and associations. Connect with other members to form interest groups for sharing experiences, learnings and best practices.

Resources:

- Examples of networks:
 - [ILO Global Business and Disability Network \(ILO GBDN\)](#): Worldwide network with national networks in 48 countries, supporting companies to implement disability inclusion in the workplace through technical guidance and peer-to-peer learning.
 - [Workability Asia](#): Regional network of companies, OPDs and NGOs and individuals promoting employment and livelihood opportunities for persons with disabilities in Asia.
 - [SUMMA network](#): a national disability inclusion network in Paraguay for public, private, and civil society organizations, providing peer knowledge exchange and a certification process.

Case Studies:

- **The Association of Microfinance Institutions of Uganda (AMFIU)** partnered with the **National Union of Disabled Persons in Uganda (NUDIPU)** in a long-term project aimed at increasing access to sustainable microfinance services for persons with disabilities. The project demonstrated benefits and opportunities of disability-inclusive microfinance for both persons with disabilities and MFIs. The partnership between the industry association and the national ‘umbrella’ OPD was identified as a key success factor in engaging and connecting MFIs and economically active persons with disabilities. (Source: AMFIU, NUDIPU, NAD and LFTW (2015), [‘From Financial Exclusion to formal inclusion: Empirical Evidence from the Microfinance and Disability Project in Uganda’](#).)
- In 2019, members of **Alliance for Financial Inclusion (AFI)**, a membership organisation of central banks and regulators, adopted the **2019 Kigali Statement on Accelerating Financial Inclusion for Disadvantaged Groups**, recognizing that the financial exclusion of disadvantaged groups, including persons with disabilities, is a systemic issue that requires deliberate and coordinated action at both national and global levels. Building on this commitment, AFI supported its members in disability inclusion through policy dialogues, peer learning, and knowledge products, including its [Special Report on Financial Inclusion for Persons with Disabilities \(2023\)](#).

ANNEX 1: INTEGRATING DISABILITY INCLUSION IN SOCIAL PERFORMANCE MANAGEMENT FRAMEWORKS

5.1 Introduction

Cerise+SPTF and the Barrier-Free Finance Initiative (BFFI) have collaborated to develop guidelines and resources for FSPs to promote the inclusion of persons with disabilities in financial services.

1. The **'Disability Inclusion Guide for FSPs'** produced by BFFI (**this guide**) is aimed at supporting FSPs to design, implement and monitor disability inclusion strategies across their operations, with practical examples and step-by-step guidance. It can be used by:
 - **all FSPs** seeking to advance disability inclusion within their organization, as a stand-alone guide and reference manual.
 - **FSPs using Cerise+SPTF's 'SEPM Guide – Disability Inclusion Focus'** to integrate disability inclusion within their social performance management systems, as a complementary resource.
2. The **'SEPM Guide – Disability Inclusion Focus'** produced by Cerise+SPTF is designed to support FSPs to understand where and how disability inclusion can be integrated within the framework of [Cerise+SPTF's Universal Standards](#) and [tools and resources](#) for Social and Environmental Performance Management (SEPM). It can be used by:
 - organizations already familiar with the Universal Standards
 - organizations that use or plan to use SPI Online assessment tools and resources

The **'SEPM Guide – Disability Inclusion Focus'** includes **a suite of disability inclusion indicators** aligned to the dimensions, standards and essential practices of Universal Standards. These are designed to support FSPs to assess their disability inclusion practices as part of their ongoing social performance assessment, improvement, reporting and learning process.

The majority of these disability inclusion indicators are incorporated within the **'SPI5 Entry** tool, with a small number of additional indicators included in the **'SPI5 Full** tool.

5.2 Disability inclusion indicators within the USSEPM

The **disability inclusion indicators** included in the **'SEPM Guide – Disability Inclusion Focus'** are listed below with **references to relevant sections in this guide**, where users can find more detailed information and guidance to support their assessment, and help them to develop action plans for improvement.

5.2.1 Disability inclusion indicators: SPI5 Entry

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Dimension 1. Social Strategy	
Standard 1A. The provider has a strategy to achieve its social goals	
Essential Practice 1.A.1 The strategy specifies the provider's target clients, social goals, and how the provider will achieve those goals	
1.A.1.1 Social strategy and goals specifically mention equitable inclusion of persons with disabilities, either as target clients, or as a subset within its target client groups	Strategy & goals
1.A.1.2 The strategy identifies the benefits that the provider seeks to create for clients with disabilities, and describes how the provider's products and services create positive change for clients, aligned to its social goals.	Strategy & goals
1.A.1.4 The provider defines a “do no harm” strategy that articulates how it will mitigate the social risks associated with the exclusion of persons with disabilities, and heightened risks experienced by persons with disabilities connected to the use of financial products and services.	Transparency, fair treatment & safeguarding
Essential Practice 1.A.2 The strategy defines indicators and targets to measure the provider's progress toward social goals.	
1.A.2.1 The provider has at least one measurable indicator on disability inclusion and at least one measurable output and/or outcome target for its disability inclusion goals.	Strategy & goals
Standard 1B. The provider collects, analyzes, and reports data that are specific to its social goals.	
Essential practice 1.B.1 The provider collects data on outcomes for clients and their households.	
1.B.1.1 Social performance data collection modalities are accessible and enable fair representation and participation of persons with different types of impairments.	Data & MIS
1.B.1.2 Employees in relevant positions receive specific training on social performance data collection and entry, including accessibility and inclusion, inclusive data collection, and inclusive interaction and communication with persons with disabilities.	Staff engagement, awareness & training
1.B.1.3 The provider collects data on an ongoing basis to measure whether it is achieving its social goals, including data on clients' disability status (preferably using a methodology aligned to the Washington Group Short Set questions).	Data & MIS

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Essential Practice 1.B.3 The provider reports social performance data internally and externally	
1.B.3.1 The provider's social audits cover assessment of measures to prevent discrimination or exclusion of persons with disabilities and ensure accessibility, as well as practices related to any specific social goals the provider has identified related to disability inclusion.	Planning & performance management systems
1.B.3.2 The provider reports on disability inclusion within its published social performance reporting	Strategy & goals
Dimension 2. Committed Leadership	
Standard 2A. Members of the board of directors hold management accountable for achieving the provider's social goals.	
Essential Practice 2.A.1 Board composition reflects the provider's social strategy and sound governance practices.	
2.A.1.2 At least one active board member has experience with disability inclusion from partnering with OPDs. Alternatively, the provider may partner with OPDs or other specialized organisations to ensure appropriate consultation and technical expertise.	Leadership commitment Partnerships with OPDs
Essential Practice 2.A.2 The provider trains board members on their social performance management responsibilities.	
2.A.2.1 Training for board members on social performance management responsibilities includes specific training on disability rights and inclusion related to the provider's social goals, including compliance with the UNCRPD and local legislation and regulation.	Leadership commitment
Essential Practice 2.A.3 The board makes strategic decisions based on social and financial data.	
2.A.3.2 The data used by the board to monitor the providers' social strategy should include applicable disability-related data, for instance: <ul style="list-style-type: none"> • Outcomes data for clients with disabilities • Social audit data related to measures to prevent discrimination or exclusion of persons with disabilities and ensure accessibility 	Leadership commitment
2.A.3.3 The board uses the following data, provided by management, to monitor decent working conditions for employees (with the listed minimum frequency): <ul style="list-style-type: none"> • Employee turnover rate, by gender and disability status. Minimum frequency: annually. • Analysis of employee satisfaction surveys, disaggregated by gender and disability status. Minimum frequency: every two years. 	Leadership commitment

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 2B. Senior management is responsible for implementing the provider’s strategy for achieving its social goals.	
Essential Practice 2.B.1 The provider includes social goals in its operational plan and the CEO/Managing Director holds senior managers accountable for achieving social targets.	
2.B.1.1 The provider integrates targets and actions to ensure inclusion of persons with disabilities within its business or operational plan, as a target segment and / or as sub-segments within target segments, aligned to its social goals and targets	<u>Planning & performance management systems</u>
Essential Practice 2.B.2 Management makes strategic and operational decisions based on social and financial data.	
2.B.2.1 Senior management analyzes the following data and assesses risks (Minimum frequency: annually) <ul style="list-style-type: none"> • Analysis of client protection risks and client outcomes should take into account specific vulnerabilities of clients with disabilities, and disability inclusion. • Analysis of decent work conditions (health and safety, compensation and benefits, working conditions, accessibility and reasonable accommodations when required) 	<u>Leadership commitment</u>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Dimension 3. Client-centered Products and Services	
Standard 3A. The provider collects and analyzes data to understand clients' needs.	
Essential Practice 3.A.1 The provider conducts market research and pilot testing.	
<p>3.A.1.1 Before introducing new products, services, or delivery channels, the provider conducts market research that includes gathering the following data about its target clients:</p> <ul style="list-style-type: none"> • Analysis of market share, market saturation, and potential market • Client profile data, including gender, age, disability status, location (urban/rural), and poverty/income level • Data on clients' needs, goals, and any obstacles to using financial services • Accessibility analysis of the new products, services, or delivery channels. <p>In addition, the provider includes persons with different socioeconomic and demographic characteristics, including persons with different types of impairments (physical, mental, intellectual or sensory impairments), in the design and pilot testing of new products or significant product changes, and seeks feedback on both appropriateness and accessibility.</p>	<p><u>Inclusive design processes</u></p>
Essential Practice 3.A.2 The provider uses data to identify patterns of financial behavior by client segment.	
3.A.2.1 The provider analyzes transactional data (PAR, average loan size, loan repayments, savings deposits and withdrawals by demographic and socioeconomic segments of its clients, including gender, age and disability status	<p><u>Data & MIS</u></p>
3.A.2.2 The provider analyzes product and service use (types and frequency) by persons with disabilities within its client base	<p><u>Data & MIS</u></p>
Essential Practice 3.A.3 Collect client feedback on their experiences using products and services.	
3.A.3.1 The provider conducts client satisfaction surveys with clients with disabilities using accessible channels. Minimum frequency: every other year.	<p><u>Inclusive design processes</u></p>
3.A.3.2 The provider conducts interviews with dormant and/or exiting clients with disabilities to look for evidence of product design failures.	<p><u>Inclusive design processes</u></p>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 3B. The provider’s products, services, and channels benefit clients.	
Essential Practice 3.B.1 The provider uses insights from client data to design products, services, and delivery channels.	
3.B.1.1 The provider designs new products, services (financial and non-financial), and delivery channels using insights from market and pilot studies, including disability-inclusive research, client feedback mechanisms, and client outcomes data, including for clients with disabilities. The provider also dedicates resources (funds and employee time) to ensure accessibility and continuous improvement of these products, services, and delivery channels.	<u>Inclusive design processes</u>
3.B.1.2 The provider modifies its existing products and services in response to the needs, feedback, and outcomes of persons with different types of impairments, where required. (e.g. specific requirements of persons with disabilities for emergency loans, insurances; financing assistive devices etc.). The provider also dedicates resources (funds and employee time) to ongoing improvements in accessibility of products, services, and delivery channels.	<u>Inclusive products</u>
Essential Practice 3.B.2 The provider removes barriers that prevent access to financial products and services.	
3.B.2.2 The provider offers delivery channels (physical and digital) that are accessible for persons with different types of impairments (physical, mental, intellectual or sensory impairments).	<u>Inclusive service delivery</u> <u>Physical accessibility</u> <u>Digital accessibility</u>
Essential Practice 3.B.4 The provider's products and services help clients reduce their vulnerability to shock and smooth consumption.	
3.B.4.1 The provider offers products and services for basic needs, such as housing, energy, and education, that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	<u>Inclusive products</u> <u>Inclusive service delivery</u>
3.B.4.2 The provider offers products and services that help clients maintain stable levels of expenditure despite income fluctuations that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	<u>Inclusive products</u> <u>Inclusive service delivery</u>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Essential Practice 3.B.5 The provider's products and services help clients achieve their goals.	
3.B.5.2 The provider offers products/services such as business loans for start-up, working capital, and investment. that enable clients to invest in economic opportunities, that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	Inclusive products Inclusive service delivery
3.B.5.3 The provider offers products/services for major life events such as weddings, maternity care/child birth, housing, higher education, and funerals, that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	Inclusive products Inclusive service delivery
Dimension 4. Client Protection	
Standard 4A. The provider does not overindebt clients.	
Essential Practice 4.A.1 The provider makes loan decisions based on a client's repayment capacity.	
4.A.1.1 The provider’s loan approval policies prohibit discrimination against persons with disabilities, and do not include requirements or eligibility criteria that directly or indirectly discriminate against or exclude persons with disabilities.	Loan approval and decisioning
Standard 4B. The provider gives clients clear and timely information to support client decision making.	
Essential Practice 4.B.1 The provider is transparent about product terms, conditions, and pricing.	
4.B.1.1 The provider gives a Key Facts Summary Document for borrowers in accessible and alternative formats for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats) before they sign a contract.	Transparency, fair treatment & safeguarding Accessible information & communication formats

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
<p>4.B.1.4-The provider communicates product information in ways that are accessible for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels).</p> <ul style="list-style-type: none"> • Loan contracts, savings documentation, transaction information, and insurance-related information (including policy information at enrollment and during the claims process) are provided in accessible and alternative formats for clients with different types of impairments (e.g. easy-read, large print, braille, audio formats, accessible digital formats). • Client-facing staff are trained in accessibility, inclusion and communication with clients with different types of impairments, to support informed decision making by clients with disabilities 	<p><u>Transparency, fair treatment & safeguarding</u></p> <p><u>Accessible information & communication formats</u></p>
<p>Essential Practice 4.B.2 The provider communicates with clients at appropriate times and through appropriate channels.</p>	
<p>4.B.2.1 The provider offers multiple channels for clients to ask questions or receive additional information prior to signing contract, including channels accessible to persons with different types of impairments (physical, mental, intellectual or sensory impairments).</p>	<p><u>Transparency, fair treatment & safeguarding</u></p> <p><u>Inclusive service delivery</u></p>
<p>4.B.2.2-The provider offers alternative mechanisms for registering client consent to a contract for clients who are unable to provide a signature.</p> <ul style="list-style-type: none"> • The provider makes a completed, signed copy of the contract available to clients with disabilities in accessible channels and formats (including online or physical documents). 	<p><u>Identification, authorization & verification</u></p>
<p>4.B.2.3 The provider gives clients with disabilities clear and accurate balance information in accessible channels and formats (including online or physical documents and messages).</p>	<p><u>Transparency, fair treatment & safeguarding</u></p> <p><u>Inclusive service delivery</u></p>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 4C. The provider enforces fair and respectful treatment of clients.	
Essential Practice 4.C.1 The provider's code of conduct requires fair and respectful treatment of clients.	
<p>4.C.1.2 The provider’s policies prohibit discrimination against persons with disabilities (including by denial of reasonable accommodations to access products and services).</p> <ul style="list-style-type: none"> The provider provides information about the prohibited behaviors in its code of conduct in formats that are accessible for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels). Client-facing staff are trained in accessibility, inclusion and communication with clients with different types of impairments 	<p><u>Transparency, fair treatment & safeguarding</u></p> <p><u>Accessible information & communication formats</u></p>
Standard 4D. The provider secures client data and informs clients about their data rights.	
Essential Practice 4.D.2 The provider informs clients about data privacy and data rights.	
<p>4.D.2.1 When requesting consent, the provider explains in simple, local language (written or oral) how client data will be used, and ensures accessibility for clients with different types of impairments.</p> <ul style="list-style-type: none"> The provider trains clients on the importance of protecting their personal information (including Personal Identification Numbers (PINs), savings account balances, and information on repayment issues), ensuring that training is accessible and inclusive for clients with different types of impairments and provides appropriate adaptations where needed. The provider gives clients the right to withdraw their permission to use data and clearly explains any consequences of withdrawal, in accessible formats and with communication adapted for clients with different types of impairments. Client-facing staff are trained in accessible communication and interaction with clients with different types of impairments (physical, mental, intellectual, or sensory impairments), particularly in relation to data use, consent, and privacy. 	<p><u>Equitable access & risk mitigation</u></p> <p><u>Accessible information & communication formats</u></p>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 4E. The provider receives and resolves client complaints.	
Essential Practice 4.E.1 The provider has a complaints mechanism that is easily accessible to clients and adapted to their needs.	
<p>4.E.1.2 The provider has at least two complaints channels that are free of charge and accessible, including to clients with different types of impairments (physical, mental, intellectual or sensory impairments).</p> <ul style="list-style-type: none"> If the complaint mechanism initially handles complaints through automated means, the provider makes a channel with live, human interaction available to clients, ensuring accessibility for clients with different types of impairments. <ul style="list-style-type: none"> Staff interacting with clients to handle complaints are trained in accessibility, inclusion, and communication with clients with different types of impairments. The provider ensures that clients with disabilities receive confirmation of receipt of their complaints and a notification when the complaint has been resolved in accessible formats (e.g. easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels). 	<p><u>Transparency, fair treatment & safeguarding</u></p>
<p>4.E.1.3 The provider provides information to clients on how to submit a complaint in formats that are accessible for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels).</p>	<p><u>Transparency, fair treatment & safeguarding</u></p> <p><u>Accessible information & communication formats</u></p>
Dimension 5. Responsible Human Resource Development	
Standard 5A. The provider creates a safe and equitable work environment.	
Essential Practice 5.A.1 A written Human Resources policy is available to all employees that explains and protects their rights.	
<p>5.A.1.1 The provider’s Human Resource policy explains employees’ rights and responsibilities related to the following:</p> <p>5.A.1.1.7 Workplace accessibility and the provision of reasonable accommodations in the workplace, to enable persons with disabilities to participate in the workforce on an equal basis with others</p> <p>5.A.1.1.8. A zero-tolerance policy toward discrimination based on all Protected Categories including sex, disability, race, or religion.</p> <ul style="list-style-type: none"> The provider provides the Human Resources policy in formats that are accessible for employees with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels) 	<p><u>HR management & development</u></p> <p><u>Accessible information & communication formats</u></p>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
5.A.1.3 The provider’s non-discrimination policy towards employees covers persons with disabilities, and includes the requirement to provide reasonable accommodations to enable persons with disabilities to participate in the workforce on an equal basis with others	Policies & procedures
5.A.1.4 The provider analyzes employee data by gender and disability status and job position to check that men and women are equally represented at different levels of the organization, including men and women with disabilities.	HR management & development
Essential Practice 5.A.2 Employee compensation is equitable and adequate.	
5.A.2.3 The provider analyzes salary data to check that men and women, including men and women with disabilities, receive equal pay for equal work and have equal opportunities for pay increase/promotion.	HR management & development
Essential Practice 5.A.3 The provider has a safety and health management system.	
5.A.3.1 The provider assesses specific health and safety risks faced by employees with disabilities as part of its assessments	Workplace health & safety
5.A.3.3 The provider provides accommodations to ensure the health and safety of employees with disabilities, and includes measures to ensure the safety of employees with disabilities within emergency/disaster response plans.	Workplace health & safety
Standard 5B. The provider’s Human Resource Development system is designed to attract and maintain a qualified and motivated workforce	
Essential Practice 5.B.1 The provider gives employees complete employment documentation and training to understand their job requirements.	
5.B.1.1 The provider provides individual employment contracts and terms in formats that are accessible for employees with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels).	HR management & development Accessible information & communication formats
5.B.1.4 Men and women receive equal opportunities for training and skill development, and these opportunities are accessible and inclusive to employees with disabilities, including through the provision of reasonable accommodations. <ul style="list-style-type: none"> • All new employees receive orientation and job-specific training that is accessible and inclusive to employees with disabilities, including through the provision of reasonable accommodations. • The provider makes professional development opportunities available to employees at every level in an accessible and inclusive way for employees with disabilities, including through the provision of reasonable accommodations. 	HR management & development

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Essential Practice 5.B.2 The provider gives employees formal opportunities to communicate with management.	
5.B.2.2 Grievance mechanisms include channels that are accessible to allow employees with different types of impairments to raise workplace concerns in a confidential manner (e.g. audio formats, accessible digital channels).	<u>HR management & development</u>
Standard 5C. The provider’s Human Resource Development system supports its social strategy.	
Essential Practice 5.C.1 During the recruitment and hiring process, the provider assesses each candidate’s commitment to achieving the provider’s social goals and serving its target clients.	
5.C.1.4 The provider provides the Code of Conduct in formats that are accessible for employees with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels).	<u>Accessible information & communication formats</u> <u>Recruitment & onboarding</u>
Essential Practice 5.C.2 The provider trains all employees on its social goals and on client protection.	
5.C.2.2 The provider's training for employees includes training on specific client protection considerations for clients with disabilities	<u>Staff engagement, awareness & training</u> <u>Transparency, fair treatment & safeguarding</u>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Dimension 6. Responsible Growth and Returns	
Standard 6A. The provider manages growth in a way that promotes its social goals and mitigates risks to clients.	
Essential Practice 6.A.1 The provider's strategic and/or business plan establishes responsible growth targets.	
6.A.1.3 The provider allocates funds and human resources to reinforce internal capacities for disability inclusion, such as: <ul style="list-style-type: none"> • inclusive hiring and employment practices including provision of reasonable accommodations; • training employees and partners on disability inclusion and accessibility; • integrating disability-related data in management information systems. 	<u>Leadership commitment</u>
Dimension 7. Environmental Performance Management	
Standard 7A. The provider has an environmental strategy and systems in place to implement it.	
Essential Practice 7.A.2 The provider collects, analyzes, and reports data that are specific to its environmental goals.	
7.A.2.1 The provider collects, analyzes and reports data on clients' vulnerability to climate change disaggregated by gender, age and disability status. The provider collects, analyzes and reports data on client outcomes related to its green products and services disaggregated by gender, age and disability status.	<u>Data & MIS</u> <u>Inclusive design processes</u>
Standard 7B. The provider identifies and manages environmental risks and opportunities.	
Essential Practice 7.B.2 The provider identifies and manages client-level environmental risks.	
7.B.2.1 The provider identifies specific vulnerabilities of clients with disabilities to climate change and environmental degradation	<u>Inclusive design processes</u>
7.B.2.3 The provider's risk mitigation policies and processes respond to the identified vulnerabilities of persons with disabilities to climate change and environmental degradation.	<u>Inclusive design processes</u>

Disability inclusion indicators aligned to the Universal Standards (SPI5 Entry)	Guidance in section(s):
Standard 7C. The provider offers financial and non-financial products and services to achieve its environmental goals	
Essential Practice 7.C.1 The provider offers financial products and services to achieve its environmental goals.	
7.C.1.1 The provider offers financial products or services to help clients cope with climate shocks that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	<u>Inclusive products</u>
7.C.1.2 The provider offers loans that allow its clients to implement or maintain green practices and technologies that: are accessible and available to persons with disabilities on an equal basis with others; do not exclude or discriminate against persons with disabilities; and are responsive to their needs.	<u>Inclusive products</u>
Essential Practice 7.C.2 The provider offers non-financial services to achieve its environmental goals.	
7.C.2.1-Information provided to raise clients' awareness of their climate-change vulnerability and environmental impacts in formats that are accessible to clients with different types of impairments (e.g. Easy-read, large print, Braille, audio formats, oral information, sign language, accessible digital channels). <ul style="list-style-type: none"> • Awareness raising events or activities are accessible and inclusive for clients with disabilities. • Staff carrying out awareness-raising talks and events are trained in accessibility, inclusion and communication with clients with different types of impairments. 	<u>Client training & capacity building</u> <u>Accessible information & communication formats</u>
7.C.2.2 Capacity-building activities to help clients reduce their climate-change vulnerability and environmental impacts are accessible and inclusive for clients with disabilities. -Staff delivering capacity building activities are trained in accessibility, inclusion and communication with clients with different types of impairments.	<u>Client training & capacity building</u>

5.2.2 Additional disability inclusion indicators: SPI5 Full

Disability inclusion indicators aligned to the Universal Standards (Additional indicators in SPI5 Full tool)	Guidance in section(s)
Dimension 1. Social Strategy	
Standard 1B. The provider collects, analyzes, and reports data that are specific to its social goals.	
Essential Practice 1.B.2 The provider analyzes outcomes data by client segment.	
1.B.2.2 The provider analyzes outcomes for according to their client profile by: gender; age; disability status, location (urban/rural); poverty/income level	Data & MIS
Dimension 2. Committed Leadership	
Standard 2A. Members of the board of directors hold management accountable for achieving the provider’s social goals.	
Essential Practice 2.A.1 Board composition reflects the provider’s social strategy and sound governance practices.	
2.A.1.4. The board includes members representative of the provider’s target clients, including persons with disabilities, aligned to its social strategy. Alternatively, the provider may partner with OPDs to ensure appropriate representation of the perspectives of persons with disabilities.	Leadership commitment Partnerships with OPDs
Dimension 3. Client-centered Products and Services	
Standard 3A. The provider collects and analyzes data to understand clients' needs.	
Essential Practice 3.A.3 Collect client feedback on their experiences using products and services.	
3.A.3.3 The provider investigates whether particular stresses for households which include members with disabilities make it more difficult for persons with disabilities and / or their families / support persons to use its products and services	Inclusive design processes
Standard 3B. The provider’s products, services, and channels benefit clients.	
Essential Practice 3.B.3 The provider's products, services, and channels protect clients from harm.	
3.B.3.3 The provider accepts alternative forms of collateral from clients whose gender, disability status or age creates barriers to access in the local context.	Inclusive products
3.B.3.7 If the provider uses agents, it should have procedures to ensure agents comply with its client protection policies, including specific client protection measures related to clients with disabilities, and that services provided by agents are accessible for clients with disabilities.	Transparency, fair treatment & safeguarding

Disability inclusion indicators aligned to the Universal Standards (Additional indicators in SPI5 Full tool)	Guidance in section(s)
Essential Practice 3.B.5 The provider's products and services help clients achieve their goals.	
3.B.5.1 The provider offers training to clients in areas where they have skill gaps that prevent them from achieving their goals, using training modalities, format, content and delivery that are accessible to and inclusive of persons with disabilities. -Staff carrying out training to clients are trained in accessibility, inclusion and communication with clients with different types of impairments.	Client training & capacity building Inclusive outreach
Dimension 4. Client Protection	
Standard 4A. The provider does not overindebt clients.	
Essential Practice 4.A.1 The provider makes loan decisions based on a client's repayment capacity.	
4.A.1.4 The provider's development processes and reviews of its algorithms include mitigation of bias against persons with different types of impairments.	Loan approval and decisioning
Standard 4B. The provider gives clients clear and timely information to support client decision making.	
Essential Practice 4.B.1 The provider is transparent about product terms, conditions, and pricing.	
4.B.1.5 If the provider uses agents, it verifies that agents provide sufficient documentation in accessible and alternative formats for clients with different types of impairments (e.g. Easy-read, large print, braille, audio formats, accessible digital formats)	Transparency, fair treatment & safeguarding Accessible information & communication formats
Essential Practice 4.B.2 The provider communicates with clients at appropriate times and through appropriate channels.	
4.B.2.4 The provider gives clients with disabilities loan repayment reminders in accessible channels and formats (including online or physical documents).	Transparency, fair treatment & safeguarding Accessible information & communication formats

Disability inclusion indicators aligned to the Universal Standards (Additional indicators in SPI5 Full tool)	Guidance in section(s)
Standard 4C. The provider enforces fair and respectful treatment of clients.	
Essential Practice 4.C.1 The provider's code of conduct requires fair and respectful treatment of clients.	
4.C.1.4 If the provider partners with third parties, it reviews the third party's code of conduct prior to signing a contract to check for commitment to fair and respectful treatment of clients, including clients with disabilities.	Transparency, fair treatment & safeguarding
Standard 4D. The provider secures client data and informs clients about their data rights.	
Essential Practice 4.D.1 The provider maintains the security and confidentiality of client data.	
4.D.1.1 The provider's policies should include measures that enable clients with different types of impairments to access its products and services, prioritizing independent access, while mitigating risks to the client and safeguarding the security of the client's data.	Equitable access & risk mitigation
Dimension 5. Responsible Human Resource Development	
Standard 5A. The provider creates a safe and equitable work environment.	
Essential Practice 5.A.3 The provider has a safety and health management system.	
5.A.3.2 The provider documents and reports to management all occupational accidents, injuries, and illnesses, disaggregated by gender and disability status and by position: Minimum frequency: annually.	Workplace health & safety
Standard 5B. The provider's Human Resource Development system is designed to attract and maintain a qualified and motivated workforce	
Essential Practice 5.B.2 The provider gives employees formal opportunities to communicate with management.	
5.B.2.3 The provider measures satisfaction and concerns of employees with disabilities with employment conditions, both in general and related to their specific needs.	HR management & development

Disability inclusion indicators aligned to the Universal Standards (Additional indicators in SPI5 Full tool)	Guidance in section(s)
Standard 5C. The provider’s Human Resource Development system supports its social strategy.	
Essential Practice 5.C.1 During the recruitment and hiring process, the provider assesses each candidate’s commitment to achieving the provider’s social goals and serving its target clients.	
5.C.1.3 New employee orientation and induction training for client-facing staff includes checking and strengthening capacities for: <ul style="list-style-type: none"> -understanding and serving the needs and priorities of clients with disabilities within target segments -accessibility and inclusion, and -communicating clearly and respectfully with clients with different types of impairments (physical, mental, intellectual or sensory impairments) 	Recruitment & onboarding Staff engagement, awareness & training
Essential Practice 5.C.2 The provider trains all employees on its social goals and on client protection.	
5.C.2.1 The provider trains all employees on disability awareness and inclusion and how they can contribute in their role to ensure inclusion of persons with disabilities	Staff engagement, awareness & training
Dimension 7. Environmental Performance Management	
Standard 7B. The provider identifies and manages environmental risks and opportunities.	
Essential Practice 7.B.1 The provider identifies and manages its own environmental risks at headquarters and branch level.	
7.B.1.2 The provider provides accommodations to ensure the health and safety of employees with disabilities, and includes measures to ensure the safety of employees with disabilities within emergency/disaster response plans. <ul style="list-style-type: none"> - The provider's disaster contingency plan is provided in formats that are accessible for employees with different types of impairments (e.g. Easy-read, large print, braille, audio formats, oral information, sign language, accessible digital channels). 	Workplace health & safety Accessible information & communication formats
Essential Practice 7.B.3 The provider identifies opportunities to finance green practices and technologies.	
7.B.3.3 Market research modalities for assessment of demand for green practices and related financial needs of target clients are accessible and enable fair representation and participation of persons with different types of impairments.	Data & MIS Inclusive design processes

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